

Mississippi Department of Environmental Quality Office of Pollution Control

I-sys 2000 Master Site Detail Report

Site Name: Hercules Inc

PHYSICAL ADDR	<u>ESS</u>		OTHER INFORMATION				
LINE 1:	613 West 7th St	reet			MASTER ID:	002022	1
LINE 2:					COUNTY:	Forrest	1
LINE 3:					REGION	SRO	
MUNICIPALITY:	Hattiesburg				SIC 1:	2822	
STATE CODE:	MS				AIR TYPE:	TITLE V	
ZIP CODE:	39401-				HW TYPE:	LARGE QUANTITY	
					SOLID TYPE:		
MAILING ADDRE	<u>ss</u>			li	WATER TYPE:	INDUSTRIAL	1
LINE 1:	PO Box 1937				BRANCH:	Chemical	
LINE 2:							
LINE 3:					ECED CONTAC		
MUNICIPALITY:	Hattiesburg				Yassin, Mohamr	nad	
STATE CODE:	MS				BASIN:		
ZIP CODE:	39401-	_				1200	
		□ PSD	□ NSPS		NESHAPS V	MACT	٦
AIR PROGRAMS	✓ SIP	∐ rou	143F3		.12010110		- 1



Mississippi Department of Environmental Quality Office of Pollution Control

Pemits				
PROGRAM	PERMIT TYPE	PERMIT #	MDEQ PERMIT CONTACT	ACTIVE
HAZ. WASTE	EPA ID	MSD008182081		YE
AIR	TITLE V	080000001	Ketchum, Brian	YE
AIR	SOP	08000001	Ketchum, Brian	YE
WATER	NPDES	MS0001830	Cook, Charles	N
WATER	NPDES	MS0001830	Cook, Charles	N
WATER	NPDES	MS0001830	Beasley, Jerry	YI
WATER	PRE-TREATMENT	MSP091286	Tomkins, Tracy	YI
GENERAL	SARA TITLE III	MSR110153	Lavallee, Louis	Y
Complianc	e Actions	0	100	
MEDIA	ACTIVITY TYPE	SCHEDULED	COMPLETED INSPECTED BY	
WATER	CEI - NA	3/17/99	3/17/99 Yassin, Mohamn	nad
WATER	CMI - PRETREATMENT	11/1/99	Sharp, Loyd	
WATER	CMI - NPDES	4/1/00	Sharp, Loyd	
WATER	CMI - NPDES	11/1/99	Sharp, Loyd	
WATER	CEI - NA	9/30/00	· Yassin, Mohamn	nad
HAZ WASTE	Compliance Evaluation Inspec	t 9/30/00	Yassin, Mohamn	nad
AIR 💌	_ State Compliance Inspection	9/30/00	Yassin, Mohamn	nad
HAZ WASTE	Compliance Evaluation Inspec	t 6/30/99	6/30/99 Yassin, Mohamn	nad
AIR	State Compliance Inspection	6/29/99	6/29/99 Yassin, Mohamn	nad
WATER	CEI - NA	6/30/99	6/30/99 Yassin, Mohamn	nad

Add a New Site

Site Name: Harries Incorporated Air Type: The & Water Type: Industrial HW Type: LGG Site General Information County: Forcet Contact Name: Charles Jordan Contact Phone: (601) 5 f 5 - 3 f 50 Physical Address City, State, Zip: Hattishing MS 13 9 4 o 1 Owner's Name: Owner's Address City, State, Zip: Ms 3 9 4 o 1 Owner's Address City, State, Zip: Contractor Name: Operator or: Contractor Name: Operator or: Contractor Name: Address City, State, Zip: Cit		•	***
Air Type: Time & Water Type: Induction Site General Information County: Forryt Contact Name: Charles ordan Contact Title: Environmental Good instar Chy, State, Zip: Hattisbury IMS 1394a Mailing Address City, State, Zip: Po & 1927 Lettisbury IMS 1394a Owner's Name: Owner's Address City, State, Zip: Contractor Name: Owner's Address City, State, Zip: City, State,	Site Name: Harc	When the state of	
Air Type: Time & Water Type: Industrial HW Type: [LGC Site General Information County: Forcyt Contact Name: Charles Fordam Contact Phone: [601) 5 + 5 - 3 + 50 Physical Address City, State, Zip: [MS] 39401 Mailing Address City, State, Zip: [MS] 39401 Owner's Name: Owner's Address City, State, Zip: [MS] 39401 Owner's Address City, State, Zip: [MS] 39401		9.	The second
Site General Information County: Contact Name: Contact Title: Contact Phone: (601) 5 f 5-3450 Physical Address: City, State, Zip: Mailing Address City, State, Zip: Owner's Name: Owner's Name: Owner's Address City, State, Zip: Operator.or: Contractor Name: Address: City.	in the second	Hercules Incorporate	d .
Site General Information County: Contact Name: Contact Title: Contact Phone: Contact Phon	Air Type: Tille	Water Type: Induce	7)
Contact Name: Contact Title: Contact Phone:		***************************************	HW Type: LGC
Contact Name: Charles Jordan Contact Title: Contact Phone: (601) 5 + 5 - 3 + 5 0 Physical Address: City, State, Zip: Mailing Address City, State, Zip: Multiplication Owner's Name: Owner's Address City, State, Zip: Operator.or: Contractor Name: Address: City, State, Zip:	Site General In	formation	₩.
Contact Name: Contact Title: Contact Title: Contact Phone:		·	
Contact Title: Contact Phone: Contact Phone:		Forryt -	1
Contact Phone: (601) 5 + 5 - 3 + 50 Physical Address City, State, Zip: Malling Address City, State, Zip: Owner's Name: Owner's Address City, State, Zip: Operator or: Contractor Name: Address City.		Charles Jordan	
Physical Address City, State, Zip: Mailing Address City, State, Zip: Description Owner's Name: Owner's Address City, State, Zip: Operator.or: Contractor: Name: Address: City Address: City	1.0		
Mailing Address City, State, Zip: Modern State, Zip: Po Po Po 1937 Hethicabury Owner's Name: Owner's Address City, State, Zip: Contractor Name: Address City.	7. T	(60i) 545-3450	
Mailing Address City, State, Zip: Owner's Name: Operator.or: Contractor: Name: Address: City.	Physical Address:	613 West 7th Street	
Mailing Address City, State, Zip: Owner's Name: Operator.or: Contractor Name: Address: City.		Hattisburg IN	AS 3942
Owner's Name: Owner's Address City, State, Zip: Operator or: Contractor Name: Address: City.	Mailing Address		
Owner's Name: Owner's Address City, State, Zip: Operator.or: Contractor: Name: Address: City.	The second of th	Hetsiasbyr	
Owner's Address City, State, Zip: Operator.or: Contractor Name: Address: City.		Military Company	15 13 9 4 0 1 Profession in
Operator.or: Contractor Name: Address: City.	Owner's Address		
Address City	City, State, Zip:		
Address City	Operator or		
Address City, State, Zip:	Contractor Name:		
	Address City, State, Zip:	4.5	bu a
	L.		

M5000 1800



Lab Bench No.: 2782

Cost Code: 3700

I. **GENERAL INFORMATION:**

Facility Name: Hercules

County Code: 0800

Discharge No: 001

Sample Point Identification: Process wastewater and stormwater

Requested By: Comp. Monitoring

Type of Sample: Grab: X Composite: Flow: Data To: Mahammad Yassin

NPDES Permit No.: 01830

Time: X Other:

Date Requested:

П. SAMPLE IDENTIFICATION:

Environment Condition: Clear/cool

Where Taken: Downstream of the flume

Collected By: J.Bonck

	Туре	Parameters	Preservative	Date	Time
1.	Composite	BOD,SS	Cool	10/27/98	1200
2.	Composite	TOC	5 ml H ₂ SO ₄	10/27/98	1200
3.	Grab	O&G	5 ml H ₂ SO ₄	10/27/98	1200
4.	Grab	Phenol	5 ml H ₂ SO ₄	10/27/98	1200
5.					
6.					

Ш. FIELD:

Analysis	Compute	r Re Code	-	Analyst	Date
рН	000400	X	7.5/7.4	JB	10/26-27/98
D.O.	000300				
Temperature	000010	X	28.8°C, 29.1°C	JB	10/26-27/98
ResidualChlorine	050060				
Flow	074060				

IV. TRANSPORTATION OF SAMPLE:

Bus: X

RO Vehicle:

Other:

V. LABORATORY:

Received by: Jackie Key

Date: 10/28/98

Time: 1119

Recorded by: Dot Lewis

Date Sent to State Office: //-17-98

VI. Remarks:

Lab Bench No.: 2782

Analysis	Computer Code	Req	l Result		Analys	Date Measured or Date Test Initiated
BOD	000310	X	64.0	mg/l	KF	10/28/98
COD	000340			mg/l		
TOC	000680	X	37.0	mg/l	KF	11/4/98
Suspended Solids	099000	X	8.0	mg/l	KF	10/30/98
TKN	000625			mg/l		
Ammonia-N	000610			mg/l		
Fecal Coliform	074055		coloni	es/100ml		
Total Phosphorous	000665			mg/l		
Oil & Grease	000550	X	<5.0	mg/l	KF	11/2/98
Chlorides	099016			mg/l		
Phenol	032730	X	<0.05	mg/l	VS	11/9/98
Cyanide	000722			mg/l		
Nitrate-Nitrite	000630			mg/l		
Alkalinity	000410			mg/l		
Hardness	000900			mg/l		

Remarks:



BUREAU OF POLLUTION CONTROL SAMPLE REQUEST FORM

ab	Bench	No.	

I.	GENERAL INFORMATI	ON: Faci	lity Name	HERCUL	ES	56456		
		0800	-		NPDES Per	mit No.	01830	
	Discharge No.	001				Request		
	Sample Point Iden	tificatio	PROCESS	WASTEWAT				
	Requested By	COMPLIANO	E MONITORIN	C	Data	To M	AHAMMAD YASSIN	
	Type of Sample:		Composite		(Time X)	Other (
TT	SAMPLE IDENTIFICA		Composite	(110#)	(IIMC X)	other (0 1
11.			00-1	. 0		Collect	ad By Jeff	Brack
	Environment Condi		lear (co	21		COLIECT	ed by	Kjoracc
	Where Taken Down			Cherre	Programme	due	Data	m.t.
	Type		arameters /	0	Preservat	Ive	Date	Time
	1. COMPOSITE	BOD-SS	<u> </u>	<u> </u>	00L		10-27 88	
	2. COMPOSITE	TOC			m1 H ₂ SO,		10-27-98	
	3. GRAB	0&G			ml H ² SO ⁴		10-27-98	
	4. GRAB	PHENOI	2		m1 H ₂ SO ₂		10-27-98	12:00
	5				- T			
III.	FIELD:							
	Analysis		ıter Code	Request	the second second	E-1	Analyst	Date
	pН	•	000400)	(X)	7.5 7.4		JB JB	10-26 , 10-2
	D.O.	•	000300)	()			M355	
	Temperature	((000010)	(X)	28.8°C, 29	1.0	JB JB	10-26, 10-27
	Residual Chlorine	((050060)	()				
	Flow	(1	74060)	(X)				
IV.	TRANSPORTATION OF	SAMPLE:	Bus ()	RO Vehicl	e () Oth	er ()	- Contract (1) (1) (1) (1)	
V.	LABORATORY: Rece:	ived By	Julu,	Co	Dat	e 10-2	8 78 T	i.me ///9
	Recorded By		1)		Date Sent	to Stat	e Office	1
	-	Computer		1			Andrew 1	Date
	Analysis	Code	Request	10/2	Result		Analyst	Measured
	BOD ₅	(000310)	()	640	m	g/1	RF	*11)-28-4
	COD	(000340)	()			g/1		4
	TOC	(000680)	()	37,6		g/1	KP	71-4-98
	Suspended Solids	(099000)	()	8.0		g/1	KF	11)-30-9
	TKN	(000625)	()			g/1		7
	Ammonia-N	(000610)	()			g/1		
	Fecal Coliform(1)	(074055)	()		colonies/100			*
	Fecal Coliform(2)	(074055)	$\dot{}$		colonies/100			*
	Total Phosphorus	(000665)	Ò			g/1		
	Oil and Grease(1)		$\dot{}$	15,0		2/1	KE	11-7-40
	Oil and Grease(2)	(000550)				g/1		11-6/1
	Chlorides	(099016)				g/1		-
	Phenol	(032730)	23	20.0	The second secon	g/1	VS	11-9-98
	Total Chromium	(001034)			the last the	g/1 —	V	- L
	Hex. Chromium	(001034)				$\frac{g/1}{g/1}$		
	Zinc	(001032)		· · · · · · · · · · · · · · · · · · ·		g/1		
	Copper	(001042)						
	Lead	(001042)	()			$\frac{g/1}{a/1}$ —		
			()			$\frac{g/1}{g/1}$ —		
	Cyanide	(000722)	()		m/	<u>g/1</u>		
			()					
,								
	Remarks							
	VCHRIVS							

*Date of Test Initiation

7700

2782

Lab Bench No.: 2784 Cost Code: 3700

I.	GENERAL	INFORMA	TION:
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Facility Name: Hercules

County Code: 0800

Discharge No: 002

Sample Point Identification:

Requested By: Comp. Monitoring

Type of Sample: Grab: X Composite:

NPDES Permit No.: 01830

Date Requested:

Data To: Mohammad Yassin

Flow: Time: Other:

II. SAMPLE IDENTIFICATION:

Environment Condition: Clear/cool

Concet

Collected By: J.Bonck

Time: 1119

Where Taken: Below foot bridge that crosses the discharge ditch

Туре	Parameters	Preservative	Date	Time
1.				
2.				
3.				
4.				
5.				

III. FIELD:

Analysis	Computer	Req	Results	Analyst	Date
р Н	000400	X	7.5/7.5	JB	10/26-27/98
D.O.	000300				
Temperature	000010	X	26.7°C/27.4°C	JB	10/26-27/98
ResidualChlorine	050060				
Flow Total Batch	074060	X	1.0 MGD	JB	10/27/98

IV. TRANSPORTATION OF SAMPLE:

Bus: RO Vehicle: Other:

V. LABORATORY:

Received by: Jackie Key Date: 10/28/98

Recorded by: Dot Lewis Date Sent to State Office: 10-29-98

VI. Remarks: No Sample



BUREAU OF POLLUTION CONTROL SAMPLE REQUEST FORM

Lab	Bench	No.	

I.	GENERAL INFORMATI	ON: Facility	Name HERCU	LES		
	County Code	0800		NPDES Peri	mit No. 01830	
	Discharge No.	002		Date	Requested	
	Sample Point Iden			-CONTACT COOLING		
	Requested By Co		TORING	Data		YASSIN
	Type of Sample:		posite (Flow) (Time)	Other ()	
II.	SAMPLE IDENTIFICA		1			-000 1
	Environment Condi		a foot		Collected By	
	Where Taken		budge the		discharge die	
	Type	Parame	ters	Preservati	Lve Date	Time
	1. 2.					
	3					
	/					
	5.					
Τ.	FIELD:					
	Analysis	Computer	Code Requ	est Results	Analys	t Date
	pH	(00040			5 - 73 73	10-26, 10
	D.O.	(00030			20,2	10 20,70
	Temperature	(00001	•		24° JB, JB	10-24,10-
	Residual Chlorine	•				10 24 1 10
	Flow	(07406)	(X) (X	1-0 M	6D 3B	10-27-9
٧.	TRANSPORTATION OF	SAMPLE: Bus		icle () Othe	er ()	
٧.	LABORATORY: Rece	ived By	alle 1 -	Date	10-28-8	Time ///
	Recorded By		10 0 0	Date Sent	to State Office	
		Computer /			1000	Date
	Analysis		equest	Result	Analyst	Measured
	BOD	(000310)	()	mg	1/1	*
	COD	(000340)	()		:/1	
	TOC	(000680)		mg	:/1	1.40 1
	Suspended Solids	(099000)		mg		
	TKN	(000625)			/1	
	Ammonia-N	(000610)			/1	
	Fecal Coliform(1)		151 /	colonies/100		*
	Fecal Coliform(2)		V /	colonies/100		<u>*</u>
	Total Phosphorus		XX / -	mg		
	Oil and Grease(1) Oil and Grease(2)		13/	mg		
	Chlorides	(099016)		mg mg		
	Phenol	(032730)		mg mg		
	Total Chromium	(001034)		mg		
	Hex. Chromium	(001032)		mg		
	Zinc	(001092)		mg		
	Copper	(001042)		mg		
	Lead	(017501)	()	mg		
	Cyanide	(000722)	()	mg		
			()			
•			()			
			()			
			()			
			()			
			()			
			()			
-			()			
	Remarks					

*Date of Test Initiation

7700

2784

FATHEAD MINNOW ACUTE BIOASSAY

CLIENT: HERCULES, INC. DATE STARTED: 09/22/98 TIME STARTED: 01:00 P.M. ANALYST: JDS

			NUMBI	ER DEA	D			
REP #		A				В		
HOURS	24	48	72	96	24	48	72	96
0.8	0	0	0	0	0	0	0	0
6.25%	0	0	0	0	0	0	0	0
12.5%	0	0	0	3	0	1	1	1
25%	0	0	1	4	0	0	0	0
50%	4	4	5	7	4	5	5	6
100%	10	10	10	10	10	10	10	10
	<u></u>	<u> </u>			<u> </u>		<u> </u>	

LABORATORY NOTES:

Test Method: 96-hr acute definitive bioassay Species: Pimephales promelas (fathead minnow)

Age: <24hr-old

No. Replicates:

No. Organisms/Rep: 10

No. Dilutions: 5 + control

Sample I.D.: Final Ditch

Date Initiated: 09/22/98

Lcs. 7 18.7 granit

 $LC_{50} = 33.47$

RAW DATA CERTIFIED BY: John D. Sulliva- DATE: 10/8/48

Ceriodaphnia dubia ACUTE BIOASSAY

CLIENT: HERCULES, INC. DATE STARTED: 09/22/98 TIME STARTED: 02:30 P.M. ANALYST: JDS

NUMBER	DEAD
--------	------

				IBER DE				
REP #		A	E	В			I)
HOURS	24	48	24	48	24	48	24	48
0%	0	0	0	0	0	0	0	0
6.25%	0	0	0	0	0	0	0	0
12.5%	0	0	0	0	0	0	0	0
25%	0	0	0	0	0	0	0	0
50%	0	٥	1	0	0	0	0	2
100%	0	1	0	1	0	1	1	2

LABORATORY NOTES:

Test Method: 48-hr acute definitive bioassay

Species: Ceriodaphnia dubia (water flea)

Age: <24hr-old

No. Replicates:

No. Organisms/Rep: 5

No. Dilutions: 5 + control Sample I.D.: Final Ditch

Date Initiated: 09/22/98

LC₅₀ > 100%

RAW DATA CERTIFIED BY:

John D. Sullivan DATE: 10/8/42

HERCULES INCORPORATED

16A Appropriation Request

Detail Estimate
Page 1 of 5

		5						
Tiffe	Storm/Waste H2O Separation Plant Hattiesburg Estimated by	d by	Dan	Dan Moore	a	Date	Date 2/27/98	Ť
	Description	- z	Mo	Materials		Labor	Total	_
		1 -	Quantity	Unit	Amount	Amount	5	
	Sewers, Drains, & Ditches - Foundations Account No. 8711-3	NO 14						
Site 1	South East corner of Old Pexite Location Provide concrete drop inlet for storm water collection. Galvanized grating over drop inlet							
Site 2	Primary Separation Basin, south west of Power House Install new overflow concrete baffle, redirecting flow to UCD.							
Site 3	Hard Resins Area sump, south east of Providence St. T/T Loading Station Replace sump grating with 3/4" thick steel plate, forcing storm water around sump and into the city storm sewer just outside the plant fence.							
Site 4	Metal Resinates Area Drain, Lower manhole Plug outlet of manhole and install upper relief drain to open ditch inside hedge line to UCD.			A.:				
	Marine inflatable fender for 36" pipe plug.							
Site 5	Hard Resins area trench drain to Impounding Basin Sand bag trench drain so it will overflow into the UCD							
Site 6	Hard Resins Rail Yard area drainage Sandbag covered french just north of 1.5.#3 to divert water to east.							
020893			Page Total	5	0	0		0

HERCULES INCORPORATED

Appropriation Request Detail Estimate Page 2 of 5 16A

Sewers, Drains, & Ditches - Foundations (continued) Sewers, Drains, & Ditches - Foundations (continued) Account No. 8711-3 Site 7 South East Corner of 731 Area at 1/T unloading point Plug outlet of drop inlet leading to its and unplug line draining from Pilot Plant. Open drainage to Hard Resins Rail Yard. Site 8 Vinsol Soap Contained Area Plug outlet drain line on curb inlet a south east extents of existing contained area and remove road berm to allow water to by-pass the IB. Site 9 ID Sump Cover outlet with steel plate and fill sump with dirt. Site 10 Delnay, South East Area Drain Plug 1.5 outlet and open new outlet and new inlet in the storm sewer drain 40' to the north east. Site 11 Tank Farm Area West of RAD Install open ditch thru existing dike to divert water to storm water drainage. Site 12 Paracol Concrete Swale to L.S.#6 Dam swale with concrete head wall and tail wall for new PVC Industrial Sewer. Concrete roadway reconstruction.	Date	February 27, 1998	Appropriation No.	042	Drawing No.	No.			T
Sewers, Drains, & Ditches - Foundations (continued) Account No. 8711-3 South East Corner of 731 Area at 1/T unloading point Plug outlet of drop inter leading to 18 and unplug line draining from Pilot Plant. Open drainage channel in existing concrete containment area to allow drainage to Hard Resins Rail Yard. Vinsol Soap Contained Area Plug outlet drain line on curb inlet at south east extents of existing contained area and remove road berm to allow storm water to by-pass the 18. TD Sump Cover outlet with steel plate and fill sump with alrt. Delnav, South East Area Drain Plug 1.S. outlet and open new outlet and new inlet in the storm sewer drain 40' to the north east. Tank Farm Area West of RAD Install open ditch thru existing dike to divert water to storm water drainage. Paraccol Concrete Swale to 1.S.#6 Dam swale with concrete head wall and tail wall for new PVC Industrial Sewer. Concrete roadway reconstruction.	Tifle	Storm/Waste H2O Separation		Estimated 1		Dan Moore	9	Date	Date 2/27/98
Sewers, Drains, & Ditches - Foundations (continued) Account No. 8711-3 South East Corner of 731 Area at 1/1 unloading point Plug outlet of drop inlet leading to IB and unplug line draining from Pilot Plant. Open drainage channel in existing concrete containment area to allow drainage to Hard Resins Rail Yard. Vinsol Soap Contained Area Plug outlet drain line on curb inlet at south east extents of existing contained area and remove road berm to allow storm water to by-pass the IB. TD Sump Cover outlet with steel plate and fill sump with dirt. Delnay, South East Area Drain Plug I.S. outlet and open new outlet and new inlet in the storm sewer drain 40' to the north east. Tank Farm Area West of RAD Install open ditch thru existing dike to divert water to storm water drainage. Paracol Concrete Swale to I.S.#6 Dam swale with concrete head wall and tail wall for new PVC Industrial Sewer. Concrete roadway reconstruction.		Description			1	Materials	s	Labor	
Sewers, Drains, & Ditches - Foundations (continued) Account No. 8711-3 South East Corner of 731 Area at 1/7 unloading point Plug outlet of drop inlet leading to IB and unplug line draining from Pilot Plant. Open drainage channel in existing concrete containment area to allow drainage to Hard Resins Rail Yard. Vinsol Soap Contained Area Plug outlet drain line on curb inlet at south east extents of existing contained area and remove road berm to allow storm water to by-pass the IB. TD Sump Cover outlet with steel plate and fill sump with dirt. Delnav, South East Area Drain Plug 1.5. outlet and open new outlet and new inlet in the storm sewer drain 40' to the north east. Tank Farm Area West of RAD Install open ditch thru existing dike to divert water to storm water drainage. Paracol Concrete Swale to L.S.#6 Dam swale with concrete head wall and tail wall for new PVC Industrial Sewer. Concrete roadway reconstruction.			1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1		1	Unit	Amount	Amount	5
South East Corner of 731 Area at 1/T unloading point Plug outlet of drop inlet leading to 1B and unplug line draining from Pilot Plant. Open drainage channel in existing concrete containment area to allow drainage to Hard Resins Rail Yard. Vinsol Soap Contained Area Plug outlet drain line on curb inlet at south east extents of existing contained area and remove road berm to allow storm water to by-pass the 1B. TD Sump Cover outlet with steel plate and fill sump with dirt. Delnav, South East Area Drain Plug 1.S. outlet and open new outlet and new inlet in the storm sewer drain 40' to the north east. Tank Farm Area West of RAD Install open ditch thru existing dike to divert water to storm water drainage. Paracol Concrete Swale to L.S.#6 Dam swale with concrete head wall and tail wall for new PVC Industrial Sewer. Concrete roadway reconstruction.		Sewers, Drains, & Ditches - Foundations (confi Account No. 8711-3	inved)						
Vinsol Soap Contained Area Plug outlet drain line on curb inlet at south east extents of existing contained area and remove road berm to allow storm water to by-pass the IB. TD Sump Cover outlet with steel plate and fill sump with dirt. Delnav, South East Area Drain Plug I.S. outlet and open new outlet and new inlet in the storm sewer drain 40' to the north east. Tank Farm Area West of RAD Install open ditch thru existing dike to divert water to storm water drainage. Paracol Concrete Swale to L.S.#6 Dam swale with concrete head wall and tail wall for new PVC Industrial Sewer. Concrete roadway reconstruction.	Sife 7	20	g point inplug line draining from f ite containment area to a	Pilot Plant. Illow					
TD Sump Cover outlet with steel plate and fill sump with dirt. Cover outlet with steel plate and fill sump with dirt. Delnav, South East Area Drain Plug I.S. outlet and open new outlet and new inlet in the storm sewer drain 40' to the north east. Tank Farm Area West of RAD Install open ditch thru existing dike to divert water to storm water drainage. Paracol Concrete Swale to L.S.#6 Dam swale with concrete head wall and tail wall for new PVC Industrial Sewer. Concrete roadway reconstruction.	Site 8	, N	east extents of existing con water to by-pass the IB.	ontained					
let and new inlet in the storm sewer drain ce to divert water to storm water drainage. vall and tail wall for new PVC Industrial Sewer.	Site 9	TD Sump Cover outlet with steel plate and fill sump	with dirt.						
ce to divert water to storm water drainage. vall and tail wall for new PVC Industrial Sewer.	Site 10) Delnav, South East Area Drain Plug I.S. outlet and open new outlet and ne 40' to the north east.	ew inlet in the storm sewer	r drain					
vall and tail wall for new PVC Industrial Sewer.	Site 11	Tank Farm Area West of RAD Install open ditch thru existing dike to dive	rt water to storm water dra	ainage.					
Page Total	Site 12	vall and t	ail wall for new PVC Indust	rial Sewer.					
					Page 1	otal	0	0	0
Account Total	0000				Accoun	Total	0	0	0





raincal

CALCULATION BASIS: Current rainfall is approximately 15 acres

Blue data are extrapolated/estimated data from Dept of Arig data

Red data is 24hr, 10yr rainfall event from MDEQ

FROM THE STATE DEPARTMENT OF ARIG. - - WATERSHED PLANNING STAFF -

EVENT	1YR	2YR	5YR	10YR
30MIN	1.5 in	1.7 in	2.1 in	2.5 est.
1HR	1.9 in	2.1 in	2.6 in	3.0 est.
2HR	2.3 in	2.6 in	3.4 in	3.6 est.
3HR	2.5 in	2.9 in	3.6 in	4.1 est.
6HR	2.9 in	3.5 in	4.5 in	5.0 est.
24HR				7.7 in

Impounding Basin = 17,500 FT2

For 2ft void: volume = 17,500 *2 * 7.48 = 261,800 gallons

1st inch of rainfall soak-in factor = 0.5 2nd inch of rainfall soak-in factor = 0.9

runoff delay = 30 minutes

Acres rainfall = 15

assume 407,286 gallons per inch of rainfall

For 7.7 inches in 1440 min

Rainfall= 2,659,578 net gallons less basin void of 261,800 gallons calc time = 1470 min pump capacity needed = 1,631 GPM

SUMMARY: inches rainfall / gallons per minute pumping requirements

EVENT	1 YEAR	2 YEAR	5 YEAR	10 YEAR
30MIN	1.5/ 2,085	1.7/ 3,307	2.1/ 5,751	2.5est/ 8,195
1HR	1.9/ 3,019	2.1/ 3,384	2.6/ 5,870	3.0est/ 7,500
2HR	2.3/ 2,789	2.6/ 3,522	3.4/ 5,477	3.6est/ 5,966
3HR	2.5/ 2,341	2.9/ 3,040	3.6/ 4,261	4.1est/ 5,134
6HR	2.9/ 1,697	3.5/ 2,209	4.5/ 3,140	5.0est/ 3,610
24HR				7.7/ 1,631





raincal

CALCULATION BASIS: Proposed rainfall is approximately 10 acres

Blue data are extrapolated/estimated data from Dept of Arig data

Red data is 24hr, 10yr rainfall event from MDEQ

FROM THE STATE DEPARTMENT OF ARIG. - - WATERSHED PLANNING STAFF --

EVENT	1YR	2YR	5YR	10YR
30MIN	1.5 in	1.7 in	2.1 in	2.5 est.
1HR	1.9 in	2.1 in	2.6 in	3.0 est.
2HR	2.3 in	2.6 in	3.4 in	3.6 est.
3HR	2.5 in	2.9 in	3.6 in	4.1 est.
6HR	2.9 in	3.5 in	4.5 in	5.0 est.
24HR				7.7 in

Impounding Basin = 17,500 FT2

For 2ft void: volume = 17,500 *2 * 7.48 = 261,800 gallons

1st inch of rainfall soak-in factor = 0.5 2nd inch of rainfall soak-in factor = 0.9

runoff delay = 30 minutes

Acres rainfall = 10

assume 271,524 gallons per inch of rainfall

For 2.5 inches in 30 min

Rainfall= 502,319 net gallons less basin void of 261,800 gallons calc time = 60 min 4,009 GPM

SUMMARY: inches rainfall / gallons per minute pumping requirements

* From current data (15 acres) the maximum hydrolic loading is from a 10 year, 2.5 inch rainfall event: THEREFORE

EVENT 1 YEAR 2 YEAR 5 YEAR 10 YEAR 30MIN 2.5est/ 4,009

2HR 3HR

6HR 24HR



CLIENT: HERCULES, INC. DATE STARTED: 09/11/97 TIME STARTED: 10:45 P.M. ANALYST: RMS

			NU	MBER DEA	AD			
REP #		A	1	В		2		D
HOURS	24	48	24	48	24	48	24	48
0 %	0	0	0	О	0	0	0	0
6.25%	0	0	0	0	0	0	0	0
12.5%	0	0	0	0	0	0	0	0
25%	0	0	0	0	0	0	0	0
50	1	4	1	1	1	2	1	3
100%	3	5	5	5	5	5	4	5

LABORATORY NOTES:

Test Method: 48-hr acute definitive bioassay

Species: Ceriodaphnia dubia (water flea)

Age: <24hr-old
No. Replicates: 4
No. Organisms/Rep: 5

No. Dilutions: 5 + control Sample I.D.: Final Ditch Date Initiated: 9/11/97

TOTAL DEAD (FOR LC 50 DETERMINATION):

0% - 0
6.25% - 0
12.5% - 0
25% - 0
50% - 10
100% - 20

LC₅₀ = 50.00% (Trimmed Spearman-Karber Method)

RAW DATA CERTIFIED BY: Rich M. Slungel DATE: 10/7/97

FATHEAD MINNOW ACUTE BIOASSAY

CLIENT: HERCULES, INC. DATE STARTED: 09/11/97 TIME STARTED: 11:25 P.M. ANALYST: RMS

			NUME	ER DEA	D			
REP #		A				1	В	
Hours	24	48	72	96	24	48	72	96
0 %	0	1			0	1		
6.25%	0	0			0	0		
12.5%	0	1			0	0		
25%	0	1			0	2		
50%	1	8			1	5		
100%	10	10			10	10		

LABORATORY NOTES:

Test Method: 48-hr acute definitive bioassay Species: Pimephales promelas (fathead minnow)

Age: <24hr-old No. Replicates: 2

No. Organisms/Rep: 10

No. Dilutions: 5 + control Sample I.D.: Final Ditch Date Initiated: 9/11/97

TOTAL DEAD (FOR LC , DETERMINATION):

0% - 2 6.25% - 0 12.5% - 1 25% - 3

50% - 13 100% - 20

LC₅₀ = 42.43% (Trimmed Spearman-Karber Method)

RAW DATA CERTIFIED BY:

Ride M. Shenoul

DATE: 10/7/97



Mohammaa.

Lab Bench No.: 1257 Cost Code: 3200

I. GENERAL INFORMATION:

Facility Name: Hercules

County Code: 0800 NPDES Permit No.: 01830

Discharge No: 002 Date Requested:

Sample Point Identification: Stormwater non-contact cooling water and 001
Requested By: Compliance Monitoring
Type of Sample: Grab: Composite: Flow: Time: Other:

II. SAMPLE IDENTIFICATION:

Environment Condition: Clear/hot Collected By: C.Seymour/E.White

Where Taken: Effluent and discharge ditch bridge

	Type	Parameters	Preservative	Date	Time
1.					
2.					
3.					
4.					
5.					

III. FIELD:

Analysis	Computer	r Rec	-	Analyst	Date
рH	000400	X	7.37	EW	6/3/98
D.O.	000300				
Temperature	000010	X	37°C	EW	6/3/98
ResidualChlorine	050060				
Flow	074060	X	0.68 MGD	EW	6/3/98

IV. TRANSPORTATION OF SAMPLE:

Bus: X RO Vehicle: Other:

V. LABORATORY:

Received by: V. Stamps Date: 6/4/98 Time: 0950

Recorded by: Dot Lewis Date Sent to State Office: 6 5-98

VI. Remarks: NO SAMPLE. Composite sent to EPA for bioassay.



BUREAU OF POLLUTION CONTROL SAMPLE REQUEST FORM

Lab	Bench	No.	

1			SAMPLE REQ	DESI FORM	Dan nen		
F	GENERAL INFORMATI	ON· Facility Nam	ne HERCULES	3			
× • •	County Code 0800			NPDES Peri	nit No.	01830	
	Discharge No. 002				Requested	010.70	
	Sample Point Iden	tification STORM	WATER NON-COM			001	
	Requested ByCOM			Data	To CHARL	ES COOK	
	Type of Sample:	Grab () Compos	ite (Flow)	(Time)	Other ()		
TT.	SAMPLE IDENTIFICATION		1 1/	•		CHAD	5EY MOUR
	Environment Condi		E HOITT		Collected	By ERRO	WHITE
	Where Taken	Elucas + du	=CIARNOSE	Ditch	Bridge		
	Туре	Parameter		Preservati		Date	Time
	1.		-				
	2						
	3						
	4.						
	5.						
III.	FIELD:						
	Analysis	Computer Cod	e Request	Results		Analyst	Date
	pH	(000400)	(X)	7.37	5		6-398
	D.O.	(000300)	()				
	Temperature	(000010)	(X)	37°C.	6	-5	6-3-98
	Residual Chlorine	(050060)	()				
	Flow	(074060)	(X)	0.68 MGD	2	~	6-3-99
IV.	TRANSPORTATION OF	SAMPLE: Bus	RO Vehic	le () Othe	r ()	ACAD CALL TO A CALL	School State Control of the St
	LABORATORY: Rece:			Date	6/4/98	9	Time 0957
	Recorded By		5	Date Sent	to State 0:	ffice	
	1	Computer					Date
	Analysis	Code Requ	est	Result	Ana	alyst	Measured
	BOD	(000310) ()	mg	/1		*
	COD	(000340) ()	mg	/1		
	TOC	(000680)	11	mg			
	Suspended Solids	(099000)	//	mg	/1		
	TKN	(000625)		mg			
	Ammonia-N	(000610)	0	mg			
	Fecal Coliform(1)			colonies/100			*
	Fecal Coliform(2)			colonies/100			*
	Total Phosphorus	(000665) (mg			
	Oil and Grease(1)	(000550) (\sim	mg			
	Oil and Grease(2)	(000550) (mg mg	The same of the sa		
	Chlorides	(099016) (mg			
	Phenol	(032730) (mg			
	Total Chromium	(001034) (-	mg			
	Hex. Chromium Zinc	(001032) ((001092) (10	the second secon	<u> </u>		
		(001042)	7	mg			
	Copper Lead	(017501)	\	mg			
	Cyanide	(000722)	<u></u>	mg			
'	Cyanide	(000722)		mg	11		<u> </u>
-			<u> </u>		_		
-			16		_		
-			11		_		<u> </u>
-		· · ·			-		<u> </u>
		· · · · · · · · · · · · · · · · · · ·					
•			<u> </u>				
•		· · ·	<u> </u>				1
-)				-
-					Section 1		
Ī	Remarks Commo	osite sen	t to E	DA for	BIOA	SSAY	
		Unit - DEAL		7.00		CHI.	

7200

BUREAU OF POLLUTION CONTROL SAMPLE REQUEST FORM

Lab Bench No.: 1256

Cost Code: 3200

GENERAL INFORMATION: Motherwood I.

County Code: 0800

NPDES Permit No.: 01830 Discharge No: 001 Date Requested:

Sample Point Identification: Process wastewater and stormwater

Requested By: Compliance Monitoring

Data To: Charles Cook

Type of Sample: Grab: Composite: Flow:

Time: Other:

SAMPLE IDENTIFICATION: III.

Environment Condition: Clear/hot

Collected By: E.White/C.Seymour

Where Taken: Parshall flume at 001 outfall

	Туре	Parameters	Preservative	Date	Time
1.	*Grab	BOD,SS	Cool	6/3/98	1310
2.	*Grab	TOC	5 ml H ₂ SO ₄	6/3/98	1310
3.	Grab	O&G	5 ml H ₂ SO ₄	6/3/98	1310
4.	Grab	Phenol	5 ml H ₂ SO ₄	6/3/98	1310
5.					
6.					

Ш. FIELD:

Analysis	Computer	Re		Analyst	Date	
pН	000400	X	7.28	CS	6/3/98	>2
D.O.	000300		977			
Temperature	000010	X	37°C	EW	6/3/98	
ResidualChlorine	050060					
Flow	074060	X	0.637 MGD	EW	6/3/98	

TRANSPORTATION OF SAMPLE: IV.

Bus: X

RO Vehicle:

Other:

LABORATORY: V.

Received by: V. Stamps

Date: 6/4/98

Time: 0950

Recorded by: Dot Lewis

Date Sent to State Office: 6/7-98

Remarks: *No composite samples on outfall 00l, 002 composite to EPA VI.



Lab Bench No.: 1256

Analysis	Computer Code	Req	Result	4 2 1 1	Analyst	Date Measured or Date Test Initiated
BOD	000310	X	43.0 * 9 7 7	mg/l	vs	6/4/98
COD	000340			mg/l		
TOC	000680	X	17.0	mg/l	VS	6/1 <mark>1</mark> /98
Suspended Solids	099000	X	15.0	mg/l	KF	6/ <mark>10/</mark> 98
TKN	000625			mg/l		
Ammonia-N	000610			mg/l		
Fecal Coliform	074055		colonies/	100ml		
Total Phosphorous	000665			mg/l		
Oil & Grease	000550	X	<5.0	mg/l	VS	6/9/98
Chlorides	099016			mg/l		
Phenol	032730	X	<0.05	mg/l	KF	6/8/98
Cyanide	000722			mg/l		
Nitrate-Nitrite	000630			mg/l		
Alkalinity	000410			mg/l		
Hardness	000900			mg/l		
				; - »,		
, , , , , , , , , , , , , , , , , , , 	1					

Remarks:		



BUREAU OF POLLUTION CONTROL SAMPLE REQUEST FORM

0			
Lab	Bench	No 🐖	

		DAMI DE REC			
. GENERAL INFORMATI	ON: Facility	Name HERCULF	S		
	0800		NPDES Permit	No. 01830	
Discharge No.	001			quested	
Sample Point Iden		OCESS WASTEWATE		Marie Carlotte and the second	
	COMPLIANCE MON		Data To		
Type of Sample:		posite (Flow)	(Time X) Ot	her ()	
. SAMPLE IDENTIFICA			(= = -	ERROL	3 TIHW _
Environment Condi		S HOT	Co	llected By CHAD	
Where Taken PAR	tion	inte At O	DI outfal	1	25 / Model
	Parame		Preservative	Date	Time
Type 1. COMPOSITE GOL		LEIS	COOL	6-3-98	
			5 ml H ₂ SO,	10 3-98	1310
2. COMPOSITE COL	0&G		5 ml H ₂ SO,		1310
3. GRAB				6-3-98	1310
4. GRAB	PHENOL		5 m1 H ² SO ⁷	6-3-78	1310
5.					
. FIELD:		0 la Danie	A	Alma Tarak	
Analysis	Computer (Analyst	Date
pН	(000400	-	7.28	<u></u>	6-3-98
D.O.	(000300	-	0004		S
Temperature	(000010	•	37°C	Ent	6-3-98
Residual Chlorine		•			
Flow	(074060		0.637 MG	2 Ens	6-3-98
. TRANSPORTATION OF		RO Vehic			
	ived By		Date _		ime <u>0957</u>
Recorded By		-60	Date Sent to	State Office	
	Computer				Date
Analysis	Code Re	equest //	Result	Analyst	Measured
BOD	(000310)	() 72.0	' mg/1	V.S	*/0-1-9
COD	(000340)	()	mg/1		
TOC	(000680)	() $11/1$) mg/1	1/5	6-11-7
Suspended Solids	(099000)	() 75.0	mg/1	#F	6-10-9
TKN	(000625)	()	mg/l		
Ammonia-N	(000610)	()	mg/1		
Fecal Coliform(1)	(074055)	()	colonies/100 ml		*
Fecal Coliform(2)		()	colonies/100 ml		*
Total Phosphorus	•	()	mg/1		
Oil and Grease(1)		() 75.0	/ / / /	VS	6-998
Oil and Grease(2)	(000550)	()	mg/1		
Chlorides	(099016)		mg/1	•	
Pheno1	(032730)	0 20.	05 mg/1	KE	1-R-4
Total Chromium	(001034)	()	mg/1		<u> </u>
Hex. Chromium	(001032)		mg/1		
Zinc	(001092)		mg/1		***************************************
Copper	(001042)	\(\)	mg/1		
Lead	(017501)	\\ \	mg/1		
	(000722)	\\	mg/1		
Cyanide	(000722)		mg/ r		
					
		\sim			
		\\			
		\\			
					
		()			
	1	()			
			1 1 4 1		
Remarks # no o	man 2051-10 5	Amples on	ont fall	001	

*Date of Test Initiat:

1256



BUREAU OF POLLUTION CONTROL SAMPLE REQUEST FORM

Lab Bench No.: 270 Cost Code: 3200

I. GENERAL INFORMATION:

Facility Name: Hercules

County Code: 0800 NPDES Permit No.: 01830

Discharge No: 002 Date Requested:

Sample Point Identification: Stormwater non-contact cooling water and 001
Requested By: Comp. Monit.

Data To:Charles Cook

Type of Sample: Grab: X Composite: Flow: Time: X Other:

II. SAMPLE IDENTIFICATION:

Environment Condition: Intermittant rain

Collected By: E. White

Where Taken: Ditch prior to leaving property

	Туре	Parameters	Preservative	Date	Time
1.					
2.					
3.					
4.					
5.					
6.			9	5	

III. FIELD:

Analysis	Computer (r Re Code	_	Analyst	Date
pН	000400	X	6.91	EW	1/27/98
D.O.	000300				
Temperature	000010	X	24°C	EW	1/27/98
ResidualChlorine	050060				
Flow	074060	X	0.85 MGD	EW	1/27/98

IV. TRANSPORTATION OF SAMPLE:

Bus: RO Vehicle:

V. LABORATORY:

Received by: V. Stamps

Recorded by: Dot Lewis

Date: 1/28/98

Time: 1015

Date Sent to State Office: 2/3/9

Other: Sunbelt

VI. Remarks: No Sample

BUREAU OF POLLUTION CONTROL SAMPLE REQUEST FORM

Lab Bench No.: 269 Cost Code: 3200

I. GENERAL INFORMATION:

Facility Name: Hercules

County Code: 0800 Discharge No: 001 NPDES Permit No.: 01830

Date Requested:

Sample Point Identification: Process wastewater and stormwater

Requested By: Comp. Monit.

Data To: Charles Cook

Type of Sample: Grab: X Composite:

Flow:

Time: X Other:

II. SAMPLE IDENTIFICATION:

Environment Condition: Intermittant rain

Collected By: E. White

Where Taken:001 parshall flume

	Type	Parameters	Preservative	Date	Time
1.	Comp.	BOD,SS	Cool	1/27/98	1100
2.	Comp.	тос	5 ml H ₂ SO ₄	1/27/98	1100
3.	Grab	O&G	5 ml H ₂ SO ₄	1/27/98	1100
4.	Grab	Phenol	5 ml H ₂ SO ₄	1/27/98	1100
5.					
6.					

III. FIELD:

Analysis	Computer	r Rec	q Results	Analyst	Date
pH	000400	X	6.90/6.87	EW	1/26-27/98
D.O.	000300				
Temperature	000010	X	24°C	EW	1/27/98
ResidualChlorine	050060				
Flow	074060	X			

IV. TRANSPORTATION OF SAMPLE:

Bus:

RO Vehicle:

Other: Sunbelt

V. LABORATORY:

Received by: V. Stamps

Recorded by: Dot Lewis

Date: 1/28/98

Time: 10

Date Sent to State Office: $\frac{\partial}{\partial x}$

VI. Remarks: No flow measurement meter being repaired

Lab Bench No.: 269
Analyst Date Measured or

Analysis	Computer Code	Req		esult		Analys	t Date Measured or Date Test Initiated
BOD	000310	X	54.0	2722	mg/l	VS	1/28/98
COD	000340				mg/l		
TOC	000680	X	58.0	3017	mg/l	VS	2/3/98
Suspended Solids	099000	X	39.0	1557	mg/l	VS	2/2/98
TKN	000625				mg/l		
Ammonia-N	000610				mg/l		
Fecal Coliform	074055			colonies/	100ml		
Total Phosphorous	000665				mg/l		
Oil & Grease	000550	X	<9.0		mg/l	VS	2/4/98
Chlorides	099016				mg/l		
Phenol	032730	X	0.17	6-6	mg/l	KF	2/6/98
Cyanide	000722			·	mg/l		
Nitrate-Nitrite	000630				mg/l		
Alkalinity	000410				mg/l		
	Π						

Remarks:	
1 COLLEGE INDI	



BUREAU OF POLLUTION CONTROL SAMPLE REQUEST FORM

1			
Lah	Bench	No.	

				TI DD TODGO			
т	GENERAL INFORMATI	ON: Foodld	tu Nama	HERCU	ILES		
1.	County Code		Ly Name			0. 01830	
	Discharge No.	000			Date Requ	ested	
	Sample Point Iden		STORMWAT	ER NON-CO			
	Requested By				Data To	CHARLES COOK	
	Type of Sample:	Grab ()	Composite	(Flow)	(Time) Othe	r ()	
II.	CAMDIE TRENTTETCA	TION .				/	
	Environment Condi	tion int	ermitta	RAI	Colle	ected By ERROL	WH1 75
	Where Taken dit	ch prior	- to le	ouing	property		
	Type	Par	ameters	•	Preservative	Date	Time
	1.					_	
	2.					_	-
	3.						
	5.						
TTT	FIELD:					_	
TTT.	Analysis	Comput	er Code	Request	Results	Analyst	Date
55.	pH		0400)	(X)	6.91	En	1-27-98
	D.O.	•	0300)	()	9,11		7-21-18
	Temperature	•	0010)	(X)	24°C	Ew	1-27-98
	Residual Chlorine	•	0060)	()	N. 255 E.		
	Flow	(07	4060)	(X)	0.85 MGD	100	1-27-98
IV.	TRANSPORTATION OF	SAMPLE: B	us (x)	RO Vehicle	e () Other ()		
V.	LABORATORY: Rece	ived By	1-10	~			Time 2095
	Recorded By		1 20 20		Date Sent to St	tate Office	1092210211111111
		Computer					Date
	Analysis	Code	Request		Result	Analyst	Measured
	BOD ₅	(000310)	()		mg/1		9.8
	COD	(000340)	()		mg/1	 	-
	TOC Suspended Solids	(000680)			mg/1 mg/1		-
	TKN	(000625)			mg/1		
	Ammonia-N	(000610)			mg/1		
	Fecal Coliform(1)				colonies/100 ml		*
	Fecal Coliform(2)		$\dot{}$		olonies/100 ml		*
	Total Phosphorus		$\dot{}$		mg/l		
	Oil and Grease(1)		$\dot{}$	Vo	mg/1		•
	Oil and Grease(2)		()		mg/1		
	Chlorides	(099016)	()		mg/1		-
	Phenol	(032730)	()		9 mg/1		
	Total Chromium	(001034)	()		mg/1		
	Hex. Chromium	(001032)	()		mg/1		
	Zinc	(001092)			mg/X		
	Copper	(001042)			/gg/1		
	Lead	(017501)			mg/1		
	Cyanide	(000722)			mg/1		
				2 ()			
			\sim		A		
			\ddot{c}			1	
			$\dot{}$				
			()				
			()				5
			()				
	Remarks BuD 5	ummeral	249				X
	Phili	JARJEN	269				
nes f	*Date of Test Init	iation					



BUREAU OF POLLUTION CONTROL SAMPLE REQUEST FORM

Lab Bench No.

I.	GENERAL INFORMATI	ON: Faci	lity Name	HERCUI	ES			
		00	_		NPDES Pe	rmit No.	01830	
		001				e Reques		
	Sample Point Iden		n PROCESS	WASTEWATE				
	Requested By C	OMPLIANCE	MONITORING		Data	a To	CHARLES COOK	
	Type of Sample:	Grab (X)	Composite	(Flow)	(TimeX)	Other		
II.	SAMPLE IDENTIFICA			,	• •			
	Environment Condi	tion w	orn Hom-	PAIN		Collec	eted By ERRUC	- WHITE
			RSHALL	Flum				
	Туре		arameters	. 10(8)	Preservat	tive	Date	Time
	1. COMPOSITE	BOD-S		C	OOL		1-27-98	11:00
	2. COMPOSITE	TOC			m1 H_SO.		1-27-98	11:00
	3. GRAB	0&G			m1 H ₂ SO,		1-27-98	11:00
	4. GRAB	PHENO	Ţ		ml H ₂ SO ₄		1-27-98	
	5.	THERO	Ц		2 4		1-01-78	11 00
т	FIELD:							
- 1.	Analysis	Comp	uter Code	Request	Results	2	Analyst	Date
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	TOC	(000680)	()	38,0	T	$\frac{1}{1}$	18	07-578
	Suspended Solids		()	37.0		$\frac{g/1}{2}$	1/5	2-2-98
	TKN	(000625)	()			ig/1		
	Ammonia-N	(000610)	()			<u>ig/1</u> _		
	Fecal Coliform(1)		()	Company of the Compan	colonies/100			*
	Fecal Coliform(2)		()		colonies/100			*
	Total Phosphorus					g/1 _		
	Oil and Grease(1)		()	29,		g/1	<u> </u>	2-4-98
	Oil and Grease(2)		()			g/1		
	Chlorides	(099016)	(,)			g/1	100	
	Phenol	(032730)	(X)	0.17		g/1	KI	2-6-98
	Total Chromium	(001034)	()	157.55	m	g/1	•	
	Hex. Chromium	(001032)	()		m	g/1		
	Zinc	(001092)	()		m	g/1		
	Copper	(001042)	()		m	g/1		
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Environmental Protection Agency,

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Firm Approved

OMB No. 14 - 00 :
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NPDES	Compliance	Inspection	Return

- Come					-11-45
	Section A	: National D	ata System Coding		
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N MS0001830	98/10/27	SM	S	2	October
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		B: Facility			
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Hercules Incorporated Hattiesburg, Mississippi				1200	97/09/30
Forrest County				Exit Time/Date:	Permit Expiration Date: 2002/09/29
Neme a. of On-Site Representative(s) Walter Langhans		Title(s Plan	t Manager		Phone Nots (601)584-3226
Name, Address of Responsible Official Walter Langhans		Plant	t Manager		
613 West 7th Street P. O. Box 1937 Hattiesburg, MS 39403-1937		Phone N	584-3226	Contacted YES x No	
Section C: Areas Evaluated	During Inspecti	on (S-Satisi	actory, M-Marginal,	U-Unsatisfactory, N	N-Not Evaluated)
N Flow Measurement N Records/Reports N Records/Reports N Salage Disposal N Facility Site Review N Self-Monitoring Program N Other					
Sec	tion D: Summary	of Findings,	Comments		
The facility appears to be in c	ompliance	with po	ermit condit	ions.	
Notes and Signatures of Inspectors	Agency/Office	•		Date	
	Office of	of Pollu	ition Contro		
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Mohammad Yassin, PE					12-4-95
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Report is sent to permittee.				Date 12 - 4 - 95	Nencomp.iaree Compliance



United States Environmental Protection Agency,

Washington, D.C., 20460

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□ Compliance

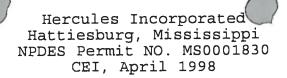
7-21-19

NPDES Compliance Inspection Report

Section A: National Data System Coding Transmission in Cale NPDES YR MO DAY Inspector Facility Type Sched'd Inspection Type N MS0001830 98/14/09 2 Jan Facility Evaluation Rating 80 ZA Reservea N N N Section B: Facility Data .are a facility inspector Entry Time: Permit Effective Date: 1:05 AM Hercules Incorporated 97/09/30 Hattlesburg, Mississippi Exit Time/Date: Permit Expiration Date: Forrest County 3:30 PM 2002/09/29 Nata : n-1.1= Representative(s) Phone Ne s Title(s) (601) 584-3226 Walter Langhans Plant Manager Nate. Admess of Responsible Official Title Walter Langhans Plant Manager 613 West 7th Street Phone No. contacted P. O. Box 1937 (601) 584 - 3226 YES NO X Hattiesburg, MS 39403-1937 Section C: Areas Evaluated During Inspection (S-Satisfactory, M-Marginal, U-Unsatisfactory, N-Not Evaluated) Z Stinft Z stanft S Flow Measurement N Pretreatment Maintenance N Laboratory S Records/Reports I riance Schedules S Sludge Disposal S Facility Site Review Efficient/Reserving Waters S Self-Monitoring Program N Other Section D: Summary of Findings/Comments See Attached Narrative Nates a signatures of Inspectors Agency/Cffice/Telephone Date Office of Pollution Control Mohammad Yassin, PE Soperation of Reviewer Agency/Office Office of Pollution Control 7-29-78

Regulatory Office Use Only

Report is sent to permittee.



ON April 13, 1998, I traveled to the referenced facility to conduct a CEI. M Walter Langhans and Mr.Randy Harvell were present during this inspection.

Permit;

A copy of the permit was available for review during the inspection.

Operation & Maintenance;

Hercules Inc. is located on west 7th street, approximately 2 miles east of Hwy 4 in Hattiesburg, Forrest County, Mississippi. It is about 200 acres in size wi a restricted access by a 7-ft high fence and a gate. The facility makes two typ of chemical resin extracted from tree rosin and paper chemicals. The treatme system at the facility consists of settling ponds, pH adjustment, treatment activated carbon, and discharge into a near by unnamed stream. There was so noticeable sulfur like smell near the ponds, otherwise the system was operat properly.

Flow Measurement;

Two Parshall flumes were used to calculated the flow at the facility.

Records / reports;

The DMR, pH reading, calibration, chain of custody, and other documentation, we available for review during this inspection.

Sludge Disposal;

Sludge from the settling ponds was being disposed of on site as non hazardo waste.

Self Monitoring;

There is a continuou reading of pH at the outfall. Hercules has been receiving a treating Zeon Chemical waste for eight years, a meter is installed to calculate t flow and weekly samples are taken to analyze for contaminants.

Laboratory;

All the samples appear to be collected and analyzed properly.



United States Environmental Protection Agency,

Washington, D.C., 20460

Form Approved OMB No.2040-0003 Approval Expires 7-31-85

NPDES Compliance Inspection Report

Section A: National Data System Coding							
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N MS0001830 9	8/06/17	SM	S	2	June		
Reserves Facility Evaluation Rating	BI	QA		Reserved			
N	N	N					
	Section B:	Facility Data					
Name and Socation of Facility Inspected				Entry Time:	Permit Effective Date:		
Hercules Incorporated				1310	97/09/30		
Hattiesburg, Mississippi				Exit Time/Date:			
Forrest County				NA	Permit Expiration Date: 2002/09/29		
Name(s) of On-Site Representative(s)		Title(s)			Phone No(s)		
Walter Langhans		Plant Mana	ger		(601)584-3226		
Name, Address of Responsible Official		Title					
Walter Langhans 613 West 7th Street		Plant Mana	ger		Particular de la constantina della constantina d		
P. O. Box 1937		Phone No.			Contacted		
Hattiesburg, MS 39403-1937 (601)584-3226				YES X NO			
Section C: Areas Evaluated During Inspection (S-Satisfactory, M-Marginal, U-Unsatisfactory, N-Not Evaluated)							
N Fermit N Flow Measurement N Pretreatment N Operations & Maintenance N Records/Reports N Laboratory N Operations & Maintenance N Sludge Disposal N Facility Site Review N Self-Monitoring Program N Other							
Sect	ion D: Summary of	Pindings/Comments					
The facility appears to be in co	ompliance w	vith permit	conditi	ons.			
Names and Signatures of Inspectors	Agency/Office/T	elephone			Date		
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Signature of Reviewer	Agency/Office				Date		
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Mohammad Yassin, PE					98-04-04		
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Number of Tables	Regulatory	Office Use Only					
Action Taken				Date	□ Noncompliance		
Report is sent to permittee.			Į.	98/08/03	■ Compliance		



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NPDES Compliance Inspection Report

Washington,

98/06/29

■ Compliance

20460

Form Approved OMB No.2040-0003 Approval Expires 7-31-85

Section A: National Data System Coding Transaction Code NPDES YR/MO/DAY Inspection Type Inspector Facility Type Ν Sched'd MS0001830 98/06/17 2 June Reserved Facility Evaluation Rating QA. Reserved N N Section B: Facility Data Name and Location of Facility Inspected Entry Time: Hercules Incorporated Permit Effective Date: 1310 Hattiesburg, Mississippi 97/09/30 Forrest County Exit Time/Date: Permit Expiration Date: NA Name(s) of On-Site Representative(s) 2002/09/29 Title(s) Walter Langhans Phone No(s) Plant Manager (601) 584-3226 Name, Address of Responsible Official Title Walter Langhans Plant Manager 613 West 7th Street P. O. Box 1937 Phone No. Hattiesburg, MS 39403-1937 Contacted (601)584-3226 YES_X_ NO__ Section C: Areas Evaluated During Inspection (S-Satisfactory, M-Marginal, U-Unsatisfactory, N-Not Evaluated) N Permit \underline{N} Flow Measurement N Operations & Maintenance N Pretreatment N Records/Reports N Compliance Schedules N Laboratory N Sludge Disposal S Effluent/Receiving Waters N Facility Site Review \underline{N} Self-Monitoring Program N Other Section D: Summary of Findings/Comments The facility appears to be in compliance with permit conditions. Names and Signatures of Inspectors Agency/Office/Telephone Date Office of Pollution Control 98/06/17 E. White Signature of Reviewer Agency/Office Office of Pollution Control Mohammad Yassin 98/06/29 Regulatory Office Use Only Action Taken Date Report is sent to permittee. O Noncompliance

RCRA INSPECTION REPORT

1) Inspector and Author of Report

Carlos E. Merizalde, E.I.T. Environmental Engineer

2) <u>Facility Information</u>

Hercules Incorporated
613 West 7th Street
P.O. Box 1937
Hattiesburg, Mississippi 39403-1937
EPA ID No.: MSD 008 182 081
Telephone number: (601) 545-3450

3) <u>Contact Official</u>

Mr. Lloyd D. Madden, Safety & Training

4) <u>Inspection Participants</u>

Carlos E. Merizalde, U.S. Environmental Protection Agency (EPA),
Region 4, South Enforcement & Compliance Section
Mohammad Yassin,
Mississippi Department of Environmental Quality (MDEQ)
Environmental Compliance and Enforcement Division
Lloyd D. Madden,
Hercules, Inc.

5) Date of Inspection

June 9, 1998

6) Applicable Regulations

RCRA Sections 3005 and 3007, 40 Code of Federal Regulations (CFR) Parts 260-270, and Part 279.

7) Purpose of Inspection

This was a Compliance Evaluation Inspection (CEI) conducted at Hercules, Inc. (the facility), in order to determine the facility's compliance with the applicable regulations cited above.

8) Facility Description Process Overview

Hercules owns a facility which is registered as a Large Quantity Generator (LQG) of hazardous waste. The facility is located in Hattiesburg, Forrest County, in southwestern Mississippi. The facility property is approximately 200 acres with access restricted by a seven foot fence, a front gate, and a guard. Hercules has operated since 1922 and currently operates 24 hours a day and seven days a week. The facility employs approximately 150 people. It is one of forty-five Hercules manufacturing facilities worldwide.

The facility includes the following operational areas:

Office Building
Warehouse
Carpenter/Paint Shop
Experimental Laboratory
Wastewater Treatment Plant
Reactor Tanks
Mobile Equipment Area
Auto Shop
Electric Shop
Railroad Car Area
Hazardous Waste Storage Area
Raw Materials Storage Tanks
Product Storage Tanks, etc.

Hercules has made resin chemicals from the beginning of operation and started making paper chemicals in 1960. Paper chemicals are used by pulping mills to give paper different qualities, such as wet strength. Resin, or rosin based, chemicals are used in a variety of products, such as, film, paint, golf balls, automotive coatings, and chewing gum.

From 1922 to 1986 the rosin was extracted from tree stumps and processed on-site. The stumps were cut into pieces and shredded and solvents were used to extract the rosin. Currently, the rosin is brought in from the Hercules facility located in Brunswick, Georgia. The rosin is hydrogenated and then processed into resin. Paper chemicals are made in batch reactors under atmospheric pressure. EPI chloride, the primary ingredient, is mixed

with other chemicals in order to achieve different properties. The final product is pumped from the bottom of the reactors into storage tanks.

Wastewater is treated on-site using an oil/water separator, dissolved air flotation, neutralization, and activated carbon. After treatment the water is discharged off-site via culvert and under a National Pollutant Discharge Elimination System (NPDES) Permit.

The facility generates primarily waste solvents, mainly toluene and acetone, (EPA hazardous waste codes D001, F003, F005), paint related waste generated during painting operations (F001, F003, F005, etc.), fluorescent light bulbs (D009), NiCad batteries (D006), lead batteries (D008), etc. Sometimes the paints and contaminated material will exceed the toxicity characteristic for cadmium (D006), chromium (D007), lead (D008), etc.

9) <u>Findings</u>

On June 9, 1998, inspectors from MDEQ and EPA met with representatives of Hercules, presented their credentials and briefed them on the formalities of the inspection and the type of activities it would cover.

90-Day Hazardous Waste Storage Area.

This is a roofed concrete structure located on the southeast side of the facility. The building has an area of approximately 800 square feet. On the front end of the storage area there is a concrete platform raised 2 feet high. A trench runs along opposite sides of this platform. The other end of the storage area is level with the ground and has approximately eighteen (18) inch walls on three sides and the platform makes up the fourth side. At the time of the inspection, the following hazardous wastes were observed in this area: two (2) fifty-five (55) gallon drums containing waste flammable solids contaminated with toluene (EPA hazardous waste codes D001 and F005). These drums were closed, labeled "Hazardous Waste", in good condition, and had a "06/03/98" start accumulation date stamped on; three (3) fifty-five (55) gallon drums containing waste flammable liquids, toluene and acetone (EPA hazardous waste codes D001, F005, and F003). These drums were closed, labeled "Hazardous Waste", in good condition, and had "04/18/98", "04/23/98", and "04/29/98", start accumulation dates stamped on. The building, and the facility in general, are surrounded by a complex system of fire houses, fire hydrants, and portable fire monitors. All facility personnel carry two-way radios as part of the communication system.

Satellite Accumulation Areas.

At the time of the inspection, the facility was operating three (3) satellite accumulation areas. The following table details the areas visited during the inspection:

Areas	Hazardous Wastes Observed
Experimental Laboratory	Outside building: one (1) fifty-five (55) gallon drum containing spent solvent (toluene) (D001, F005). Closed, labeled, electrically grounded and in good condition. Inside building: the facility keeps several small accumulation containers for collection of spent solvents as part of its laboratory activities. At the time of the inspection no hazardous waste was observed here.
Carpenter/Paint Shop	One (1) fifty-five (55) gallon drum containing waste solvent (D001, D006, D007, D008, F001, F003, F005). Closed, electrically grounded, labeled, and in good condition. One (1) fifty-five (55) gallon drum containing waste paint (D001, D006, D007, D008). The drum was OPEN and labeled. This constitutes a violation of Federal Regulations. See below for the description of this violation.
	One (1) forty (40) gallon drum containing scrap aerosol paint cans (D001, D006, D007, D008). Closed and labeled.
Mobile Equipment Area	At the time of the inspection no hazardous waste was observed here.
Raw Material and Product Storage Tanks Areas	At the time of the inspection no hazardous waste was observed here.
Wastewater Plant Area	At the time of the inspection no hazardous waste was observed here.

Areas	Hazardous Wastes Observed
Electric Shop	One (1) forty (40) gallon drum containing fluorescent light bulbs (D009) for recycling. Closed and labeled.
	One (1) twenty (20) gallon drum containing NiCad batteries (D006) for recycling. Closed and labeled.
	One (1) box with mercury containing light bulbs (D009) for recycling. Closed and labeled.
	One (1) forty (40) gallon drum containing scrap aerosol paint cans (D001, D006, D007, D008). Closed and labeled.
Auto Shop	No hazardous waste was observed. One (1) 275 gallon tank containing used oil destined for recycling. Closed, labeled, and in good condition.
	Lead batteries (D009) for recycling
	One (1) Safety-Kleen parts washer
	Used oil filters are gravity drained for several days.

a. Pursuant to: 40 CFR 265.173(a)

A container holding hazardous waste must always be closed during storage except when it is necessary to add or remove waste.

Hercules failed to keep closed one (1) fifty-five (55) gallon drum containing hazardous waste paint, located in the Carpenter/Paint Shop, in which waste was not being added or removed.

Document Review.

The following documents were reviewed for the purpose of establishing compliance status of Hercules:

Personnel training records
Weekly Hazardous Waste Inspection Records
Manifests and Land Ban Notification Forms
Waste Minimization Plan
1997 Hazardous Waste Report
Contingency Plan

Upon review, all documents were in compliance, except for the facility's Contingency Plan. The following deficiency was noted regarding the plan.

b. Pursuant to: 40 CFR § 265.52(e)

The Contingency Plan must include a list of all emergency equipment at the facility, where this equipment is required. This list must be kept up to date. In addition, the plan must include the location and a physical description of each item on the list, and a brief outline of its capabilities.

Hercules failed to provide the location, physical description, and a brief outline of the capabilities of each item on its list of emergency equipment in the facility's Contingency Plan.

10) <u>Conclusions</u>

Hercules is in violation of the applicable Standards for Generators of Hazardous Waste contained in 40 CFR Parts 262 and 265 by reference. The findings, as outlined in sections 9.a. and 9.b., are violations of the U.S. Environmental Protection Agency.

At the time of the inspection, the Auto Shop manager stated that used oil filters are only gravity drained. EPA recommends having these filters gravity hot-drained and a hole punched in their domes for proper drainage of the used oil.

11) Signed

Carlos E. Merizalde

Environmental Engineer, E.I.T.

South Enforcement and Compliance Section

12) **Approved**

Jeffrey T. Pallas, Chief

South Enforcement and Compliance Section RCRA Enforcement and Compliance Branch



EPA

NPDES Compliance Inspection Report

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		Section A:	National Data Syste	em Coding		
Transaction Code NPDES	. Y	R/MO/DAY	Inspection Type	Inspector	Facility Type	Sched'd
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		Section B	: Facility Data			
Name and Lucation of Facility Inspe	ted				Entry Time:	Permit Effective Date:
Hercules Incorporated					10:15 AM	97/09/30
Hattiesburg, Mississippi					Exit Time/Date:	Permit Expiration Date:
Forrest County					NA NA	2002/09/29
			Title 3	4		Phone No si
Name(s) of On-Site Representative(s			Plant Mana	aer		(601) 584 - 3226
Walter Langhans			Flanc Mana	ger		(001) 301 3220
Name, Address of Responsible Official			Title			
Walter Langhans			Plant Mana	ger		
613 West 7th Street			Phone No.			
P. O. Box 1937	027		(601)584-3	226		Sontacted YES X NO
Hattiesburg, MS 39403-1						
Section C: Ar	eas Evaluated	During Inspectio	n (S-Satisfactory, M	-Marginal,	U-Unsatisfactory, N-Not Sva	luated)
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N Operations & Maintenance N Records/Reports N Laboratory N Compliance Schedules N Sludge Disposal N Facility Site Review						
S Effluent/Receiving Waters N Self-Monitoring Program N Other						
Section D: Summary of Findings/Comments						
The facility appears to be in compliance with permit conditions.						
Names and Signatures of Inspectors		Agency/Office				Date
		Office o	of Pollution	Control	L	1/28/98
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Signature of Reviewer		Agency/Office	of Pollution	Contract	1	Date
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Mohammad Yassin, PE		<u> </u>				
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Report is sent to permittee.					4/15/98	S Compliance



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Washington, J.

Form Approved OMB 10.2040-0003 Approval Expires

7-31-85

NPDES Compliance Inspection Report

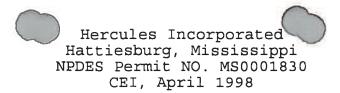
Section A: National Data System Coding Contract to 1.40 NPDES MO/DAY Inspection Type Inspector Facility Type Sched'd MS0001830 98/13/04 Jan ----Facility Evaluation Rating JA Reserved N N Section B: Facility Data Entry Time: The His Loation of Facility Inspected Permit Effective Date: Hercules Incorporated 10:40 AM 97/09/30 Hattiesburg, Mississippi Exit Time/Date: Permit Expiration Date: Forrest County 2:30 PM 2002/09/29 Name of On-Site Representative s Title(s) Phone Nois (601) 584 - 3226 Walter Langhans Plant Manager Names, Address of Responsible Official Title Walter Langhans Plant Manager 613 West 7th Street Phone No. P. O. Box 1937 Contacted (601) 584-3226 YES_X_ NO__ Hattiesburg, MS 39403-1937 Section C: Areas Evaluated During Inspection (S-Satisfactory, M-Marginal, U-Unsatisfactory, N-Not Evaluated) & Ferri S Flow Measurement N Pretreatment rerations & Maintenance S Records/Reports N Laboratory mpilance Schedules S Facility Site Review S Sludge Disposal Efficient/Receiving Waters N Other S Self-Monitoring Program Section D: Summary of Findings/Comments See Attached Narrative

Mohammad Yassin, PE	Agency/Office/Telephone Office of Pollution Control	Date 4/15/98
S r re of Koviewer	Agency/office Office of Pollution Control	Date
- T	Regulatory Office Use Only	
Action: Taken	Date	O Noncompliance

4/15/98

2 Compliance

Report is sent to permittee.



ON April 13, 1998, I traveled to the referenced facility to conduct a CEI. Mr Walter Langhans and Mr.Randy Harvell were present during this inspection.

Permit;

A copy of the permit was available for review during the inspection.

Operation & Maintenance;

Hercules Inc. is located on west 7th street, approximately 2 miles east of Hwy 49 in Hattiesburg, Forrest County, Mississippi. It is about 200 acres in size wit a restricted access by a 7-ft high fence and a gate. The facility makes two type of chemical resin extracted from tree rosin and paper chemicals. The treatment system at the facility consists of settling ponds, pH adjustment, treatment i activated carbon, and discharge into a near by unnamed stream. There was son noticeable sulfur like smell near the ponds, otherwise the system was operate properly.

Flow Measurement;

Two Parshall flumes were used to calculated the flow at the facility.

Records / reports;

The DMR, pH reading, calibration, chain of custody, and other documentation, wer available for review during this inspection.

Sludge Disposal;

Sludge from the settling ponds was being disposed of on site as non hazardou waste.

Self Monitoring;

There is a continuous reading of pH at the outfall. Hercules has been receiving an treating Zeon Chemical waste for eight years, a meter is installed to calculate th flow and weekly samples are taken to analyze for contaminants.

Laboratory;

All the samples appear to be collected and analyzed properly.



United States Environmental Protection Agency,

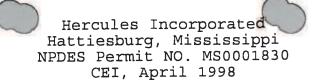
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NPDES Compliance Inspection Report

Section A: National Data System Coding Facility Type Sched'd NPDES TR'MO/DAY Inspection Type Inspector Transaction Code 2 Jan 98/13/04 MSP091286 Reserved 2A E-Section Facility Evaluation Kat no N Ν N Section B: Facility Data Entry Time: Name and Location of Facility Inspected Permit Effective Date: 10:40 AM Hercules Incorporated 97/09/30 Hattiesburg, Mississippi Exit Time/Date: Permit Expiration Date: Forrest County 2:30 PM 2002/09/29 Phone No(s) Title(s) Name(s of m.-Site Representative(s) (601) 584-3226 Plant Manager Walter Langhans Name, Address of Responsible Official Plant Manager Walter Langhans 613 West 7th Street Phone No. Contacted P. O. Box 1937 (601) 584-3226 YES X NO Hattiesburg, MS 39403-1937 Section C: Areas Evaluated During Inspection (S-Satisfactory, M-Marginal, U-Unsatisfactory, N-Not Evaluated) N Pretreatment S Flow Measurement E Farmit operations & Maintenance S Records/Reports N Laboratory S Facility Site Review N Compliance Schedules S Sludge Disposal N Other S Self-Monitoring Program S Effluent/Receiving Waters Section D: Summary of Findings/Comments See Attached Narrative

Names and Signatures of Inspectors Mohammad Yassin, PE	Agency/Office/Telephone Office of Pollution Co	ontrol	Date 4/15/98
3 ghature of Reviewer	Agency/Office Office of Pollution Co	ontrol	Date
	Regulatory Office Use Only	Date	
Report is sent to permittee		4/15/98	□ Noncompliance □ Compliance



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United States Environmental Protection Agency,

Washington, D.C., 20460



NPDES Compliance Inspection Report

Form Approved OMB No.2040-0003 Approval Expires 7-31-85

The Code	NUNEO	VD MO/DAV		T. 7.		77124. FD	C: 111
Transaction Code	NPDES	YR/MO/DAY		Type 11	nspector	Facility Type	Sched'd
N	MS0001830	97/03/31	SM		S	2	MAR
Reserved	Facility Evaluation	Rating		В		•	Reserved
				N	J	N	
Name and Location o	of Facility Inspected					Entry Time:	Permit Effective Date:
Hercules Inco	orporated					2:00 pm	10/22/91
613 West 7th						Exit Time/Date:	
Hattiesburg,	MS 39401					Exit Thire Date.	Permit Expiration Date:
Forrest Coun	ıty						10/21/96
Name(s) of On-Site R	epresentative(s)			Title(s)			Phone No(s)
Mr. Charles	Jordan			Enviro	nmental (Coordinator	(601) 545-3450
Name, Address of Res	ponsible Official			Title		·······	<u></u>
Mr. Gerald I	Burch			Plant N	Ianager		
Hercules Inco	_		}	Phone No.			T
P.O. Box 19					62-0870		Contacted
Hattiesburg,	MS 39401-1	937		(OOT) \	04-UO/U		YES NO
	Section C: Area	- Fuelmeted During Inc	spection (S-Satisfactory,	M Marginal II.	Il-entirfactory N.J	Mark Euplinated	<u></u>
					·-···		
N Permit N Records/Report		low Measureme aboratory	nt	_	etreatment mpliance Sch		rations & Maintenance udge Disposal
S Facility Site		ffluent/Recei	ving Waters		lf-Monitorir		
							- 2000
Outfall 002			nit (daily max	<u>.)</u>		pling Results (daily :	max.)
<u>Parameter</u>		mg/l	<u>lbs/day</u>		<u>mg/l</u>		
BOD TSS					29.0		
TOC					4.0 19.0		
Oil & Grease			·		19.0 <5.0		
Phenol					< 0.0	=	
Temperature		41°C			30.19		
pH			9.0 max. S.U.		7.3 S		
Flow		report (mg			1.7 n		
Names and Signatures of In	·	report (mg	Agency/Office/Te	Jenhone	1,/ 1	iigu	1
_	spectors			=			Date 2/21/07
Jeff Bonck			MDEQ/OF	'C/SKU			3/31/97
Errol White			MDEQ/OF	C/SRO			3/31/97
Signature of Reviewer	,		Agency/Office				Date
Becky Ornela	ıs		MDEQ/OF	PC	961-558	0	5/1/97
•							
						· · · · · · · · · · · · · · · · · · ·	
Action Taken				1000	5	Date	
						1	Noncompliance
							X Compliance



United States Environmental Protection Agency, Washington, D.C., 20460

Form Approved OMB No.2040-0003 Approval Expires 7-

NPDES Compliance Inspection Report 31-85 Transaction Code **NPDES** YR/MO/DAY Inspection Type Inspector **Facility Type** Sched'd MS0001830 97/02/18 MAR Facility Evaluation Rating BI QA Reserved Reserved N N Name and Location of Facility Inspected Entry Time: Permit Effective Date: **Hercules Incorporated** 9:35 am 613 West 7th Steet 10/22/91 Hattiesburg, MS 39401 Exit Time/Date: Permit Expiration Date: **Forrest County** 11:35 pm 10/21/96 Name(s) of On-Site Representative(s) Phone No(s) Mr. Charles Jordan **Environmental Coordinator** (601) 545-3450 Name, Address of Responsible Official Mr. Gerald Burch **Plant Manager Hercules Incorporated** Phone No. P.O. Box 1937 Contacted (601) 545-3450 YES____ NO__X **Hattiesburg, MS 39401-1937** Section C: Areas Evaluated During Inspection (S-Satisfactory, M-Marginal, U-Unsatisfactory, N-Not Evaluated) <u>S</u> Permit S Flow Measurement N Pretreatment S Operations & Maintenance S Records/Reports N Compliance Schedules N Sludge Disposal **S** Laboratory S Facility Site Review N Effluent/Receiving Waters S Self-Monitoring Program N Other A transcribing error was found in November of 1996. The monthly maximum limit for phenols was reported as 4.3 lbs/day. The maximum for November was 5.5 lbs/day. A corrected Discharge Monitoring Report and explanation has already been received. Names and Signatures of Inspectors ^{Date} 3/17/97 Office of Pollution Control **Becky Ornelas** 961-5580 Signature of Reviewer Agency/Office Wm. Algh Apple MDEQ/OPC 3-17-97 Date Action Taken Noncompliance Compliance

NPDES Compliance Inspection Summary

<u>Permit:</u> A copy of the currently effective permit was readily available and the facility is as described by the permit.

Records/Reports: The documentation for analyzing the samples was accurate. The conversions are done on a spreadsheet. The records are maintained for a minimum of three (3) years. Phenols are analyzed by Bonner Analytical Testing Company, at 2703 Oak Grove Road, Hattiesburg, MS 39402. The contact person at Bonner Analytical is Michael S. Bonner, Ph. D. and can be reached at (601) 264-2854. Analytical results were consistent with data reported on the DMRs.

Facility Site Review: Hercules Inc. is a diversified chemical manufacturer of modified resins and resins solutions, paper chemicals, polyamides, ketene dimer, rosin emulsions, and wax emulsion. There are two outfalls. Outfall 001 discharges process wastewater and treated stormwater. The treatment for this outfall is a sedimentation basin, dissolved air floatation, pH adjustment using caustic, neutralization, equalization, and three carbon adsorption towers. Outfall 002 is a total facility discharge containing process wastewater, non-contact cooling water, and stormwater runoff. There is no treatment for this outfall.

<u>Flow Measurement:</u> The flow measurement used are Sonic totalizers and flumes. The flowmeter is calibrated once a year.

<u>Laboratory:</u> The permittee employs Bonner Analytical Testing Company to test phenols. The other parameters are tested at the in-house laboratory.

Effluent: The wastewater discharges into an unnamed tributary of the Bowie River and seemed to be in good condition with no foam, floating solids, or discoloration.

Self-Monitoring Program: Grab and composite samples are collected for analysis in accordance with the requirements of the permit. A transcribing error was found in November of 1996. The monthly maximum limit for phenols was reported as 4.3 lbs/day. The maximum for November was 5.5 lbs/day. A corrected Discharge Monitoring Report and explanation has already been received.

Operations & Maintenance: Based upon observations during the inspection, the wastewater treatment system is operated and maintained effectively.



Permit Verification

	Ferma
	is information contained in permit-
	Inspection observations verify information contained in permit. YesX No N/A
2.	Current copy of permit is onsite. N/A
3.	Name and mailing address of permittee are correct. Yes No
4.	Facility is as described in permit. Yes X NO different, or increased
5.	Notification was given to EPA/State of new, discharges. NO. N/A X
6.	Yes No N/A _X Yes No serrect.
7.	Yes X
8.	Yes X
	Recording Keeping and Reporting
	pointained as required by Permit.
1.	Records and reports are maintained as required by permit. N/A Yes No and current.
2	
	All required information is available, complete, N/A NO N/A
	All required information is available, complete, N/A Yes NO Information is maintained for 3 years. N/A
	All required information is available, complete, Yes NO N/A Information is maintained for 3 years. NO N/A Yes X NO N/A If the facility monitors more frequently than required by permit (using approved methods), are these results reported?
4	All required information is available, completely Yes NO
4.	All required information is available, complete, NO
4.	All required information is available, completed. Yes X NO NO N/A Yes X NO N/A Yes X NO N/A Yes X NO NO N/A Yes X NO NO N/A If the facility monitors more frequently than required by permit (using approved methods), are these results reported? NO NO N/A X Yes NO N/A Yes X NO N/A
4.	All required information is available, completed. Yes X NO NO N/A Yes X NO N/A Yes X NO N/A Yes X NO NO N/A Yes X NO NO N/A If the facility monitors more frequently than required by permit (using approved methods), are these results reported? NO NO N/A X Yes NO N/A Yes X NO N/A
4.	All required information is available, complete, Yes
4.	All required information is available, completed. Yes X NO NO N/A Yes X NO N/A Yes X NO N/A Yes X NO NO N/A Yes X NO NO N/A If the facility monitors more frequently than required by permit (using approved methods), are these results reported? NO NO N/A X Yes NO N/A Yes X NO N/A

	v.		and calibration	N/A
	e. Date	es of analyses	No	N/A
	f. Name	es X of person perf	No	N/A
	Y	es ^	No at grab sample sta	N/A X
	ı	es		•
7.	Monitorin	g records are ad	dequate and include , as required by po NO	ermit
	a. Flo	w, ph, bo, ecc.,	No	N/A
	b. Mon	itoring charts	NO NO NO ion records kept	N/A
	Y	es <u>X</u>	ion records kept	
	TU TU			
			and maint	enance records are adequate. N/A
8.	Laborator	y equipment cal.	No	N/A
	1			atue RevieW
		Complian	ace Schedule St	acue
		is meeting com	pliance schedule.	× /3 V
1.		7es		
				s to begin construction. N/AX
2.	Permittee	has obtained in	NO	N/AX
	•		- have be	een executed.
3.	Contract	for engineering	ng services have be	N/A <u>×</u>
			•	- had
4.	Design p	lans and specifi	NO	N/AK
-		Yes	NO	_
_	Construc	tion has begun.	_	N/A ×
٥.	C0110 02 00	Yes	No	
		tion is on schee		N/A X
6.	Construc	Yes	No	N/A
			s on schedule.	
7.	Equipmen	t acquisition in	No	N/AX
		 -		
8.	Construc	tion has been c	NO	N/A <u> </u>
		Yes		
9.	Startup	has begun.	No	N/A X
3.		Yes	NO	
10	Dermiti	tee has requeste	d an extension of	N/A
		Yes		
		has met comt	oliance schedule.	N/A ×
11	L. Permit	Yes	No	N/A

Operation and Maintenance Evaluation

	Operation	The same
	Treatment units are properly op	erated and maintained.
1.	Treatment units are properly of	N/A
	Ves X	
	Standby power or other equivale	is provided.
	or other equivale	nt provision is provided
2.	Standby power or No	N/A
	Yes	N/A _X
1	15.	am agricument failures is available
3.	Adequate alarm system for power	N/A
	Yes X	N/A
	Sludge disposal procedures are	appropriate.
4.		
	a. Disposal of sludge accord Yes X No b. State approval for sludge	ing to regulations
	a. Disposed No	. N/A
	ies for sludge	disposal received.
	b. State approval No	N/A
	Yes <u>x</u>	
	the second section is	n backup units, are in service. N/A
5.	All treatment units, other than	N/A
3.	17	
		are followed.
	for facility operat	ion and maintenance are followed. N/A
6.		
	YesA	process
	- 1 is disposed	of to maintain treatment process
7.	Sufficient sludge is disperse	- 1-
	equilibrium.	N/A
	Yes X	N/A
		and maintenance is provided.
	Omenizational Plan (chart) fo	N/A
8.	No No	
	165A	
	Operating schedules are estable NO	ished.
9.	. Operating schedules are No	N/A
	Yes X _	•
	O. Emergency plan for treatment	gentrol established.
	Therearcy plan for treatment	N/A
10	Yes No	
	IES	. Lu-Indoas
	1. Maintenance record system ex	ists and includes:
11	1. Maintenance record of	2
	a. As-built drawings	N/A
	Yes ^ _	
	s chan drawings	N/A
	(100	· · · · · · · · · · · · · · · · · · ·
	stion specificat	ions N/A
	c. Construction by	N/A
	Yes X	
	d. Maintenance history	N/A
	Yes _X	
	A Maintenance Costs	·. N/A
	Yes X	·. N/A
		4 -
	Voc X No	to service
	of equipment re	N/A epair and timely return to service N/A
	g. Records of equipment No	N/A
	Yes X_	
	12. Adequate number of qualified NO	operators on-hand.
4	12. Adequate number of qualified No.	N/A
-	Yes X	N/A

	- The second
13.	Established procedures are available for training new operators. Yes No
14.	Adequate spare parts and supplies inventory are maintained. NO N/A
15.	Instruction files are kept for operation and maintenance of each item of major equipment. Yes No N/A
16.	Operation and maintenance manual is available. YesX NO N/A
17.	Yes whereenced.
18.	a. Hydraulic overflows and/or organic overloads are experienced. Yes X NO N/A Vocated bypass discharge occurs during power failure. NO X N/A
	Yes occurred since last inspection. C. Untreated overflows occurred since last inspection. N/A NOX Ves
	d. Flows were observed in overflow of bypass of the served in overflow of the served in overflow of the served in overflow of bypass of the served in overflow
	e. Checking for overflows is performed routinely. N/A Yes X NO N/A 1. Overflows are reported to EPA or to the appropriate State agency as specified in the permit. Yes X NO N/A Yes X NO N/A
	Permittee Sampling Evaluation
1.	Samples taken at sites specified in permit. Yes _ K NO N/A
2.	Locations adequate for representative samples. Yes No N/A
3.	Flow proportioned samples obtained when required by permit. Yes No N/AX
4.	Yes No N/A Yes No N/A
5.	sampling and analysis done in frequency specified by permit. Yes No N/A
6.	Yes X
7.	Sample collection procedures adequate:
	a. Samples refrigerated during compositing. Yes NO N/A Proper preservation techniques used. N/A NO N/A Yes NO N/A

		10 GER
	c Containers and sampl	e holding time before analyses conform to 40 CFR
	Part 136.3	No N/A timeframe needed (same day).
	d. Samples analyzed in	NO N/A if
8.	Monitoring and analyses posso, results reported in per Yes	rmittee's self-monitoring report. NO N/AX
9.	165	110
10.		·
	Sampling Inspec	tion Procedures and Observations
1.	Grab samples obtained. Yes	No N/A
2.	Composite sample obtained	NO N/A
Соп	positing Frequency: _a h	plamit preservation: as by panit
3.	Sample refrigerated during YesX	NO N/A
4.	Flow proportioned sample Yes	.10
5.	Sample obtained from fac	
6.	Sample representative of Yes	volume and nature of discharge. NO
7.	Sample split with permit	
8.	Chain-of-custody procedu	
9.	Samples collected in acc	
10	. Excessive foam, grease,	floating solids observed at the outfall. NOX N/A

<u>General</u>

	Secondary containment for oil/chemical storage tanks used at facility.
_	containment for oil/chemical storage tanks the
1.	
	a. Primary flow measuring device properly installed and maintained. NO N/A
2.	Primary flow measuring device properly M/A
4.	a. Primary flow measuring device property N/A Yes NO
	b. Flow measured at each outfall? N/A Yes X NO Yes X No The state of the straight length of pipe or channel before and after the control of the straight length of pipe or channel before and after the control of at least 5 to 20 diameters?
	Yes X length of pipe or channel before and after the
	c. Is there a straight length of pipe or channel before and after the flowmeter of at least 5 to 20 diameters? State
	flowmeter of at its No N/A of electric noise
	res is used, are there sources of the source of the sources of the sources of the source of the sources of the sources of the source of the sources of the source
	in the near vicinity?
	Ves NoN/A
	in the near vicinity? Yes NO NO N/A Yes NO N/A Yes NO N/A Yes NO N/A NO N/A NO N/A NO N/A
	f. Is the full pipe requirement met.
	f. Is the full pipe requirement met? Yes No N/A
	2 outfalls
Nun	mber of outfalls: 2 outfalls
	-1 kent
3.	a. Flow records properly kept. Yes X NO N/A b. All charts maintained in a file. N/A
	b. All charts maintained in a file.
	b. All charts maintained in a file. Yes NO NO N/A C. All calibration data entered into a log book. NO NO N/A
	c. All calibration data entered into a N/A
	Yes No N/A
	e el en magnired.
4.	Actual discharged flow measured. Yes No
	YesX
_	Effluent flow measured after all return lines. Yes No N/A
5.	Yes X No
	Secondary instruments (totalizers, recorders, etc.) properly operated and
	Secondary instruments (totalizers, recorders,
0.	maintained. N/A
	Yes No
7.	Spare parts stocked. No N/A
	Yes
	Effluent loadings calculated using effluent flow. NONO
8.	gffluent loadings calculated using diliterate N/A N/A
	Yes
	<u>Flumes</u>
	the channel and
	Flow entering flume reasonably well-distributed across the channel and
1.	Flow entering flume reasonably well-distributed to find the first star for for the first star for the first
	VAG X
	. Cross-sectional velocities at entrance relatively uniform. NO N/A
•	Cross-sectional velocities at entrance relatively N/A
2	Yes X
	s debate and deposits.
3	. Flume clean and free of debris and deposits. NO NA NO
•	Yes No N/A

5. Sides walls of flums vertical and smooth. Yes		4.	. All dimensions of flume accurate and level. Yes No N/A	
Yes X No N/A 7. Flume head being measured at proper location. Yes X No N/A 8. Measurement of flume head zeroed to flume crest. Yes X No N/A 9. Flume properly sized to measure range of existing flow. Yes X No N/A 10. Flume operating under free-flow conditions over existing range of flows. Yes X No N/A 11. Flume submerged under certain flow conditions. Yes No X N/A 12. Flume operation invariably free-flow. Yes X NO N/A 13. What type of weir is being used? Yes NO N/A 14. Weir exactly level. Yes NO N/A 15. Free access for air below the nappe of the weir. 16. Samples refrigerated during compositing. Yes NO N/A 17. Distrace form sides of weir to side of channel at least 2H.		5.		
8. Measurement of flume head zeroed to flume creat. Yes X No N/A 9. Flume properly sized to measure range of existing flow. Yes X No N/A 10. Flume operating under free-flow conditions over existing range of flows. Yes X No N/A 11. Flume submerged under certain flow conditions. Yes No X N/A 12. Flume operation invariably free-flow. Yes X No N/A Weirs 1. What type of weir is being used? Yes No N/A 2. Weir exactly level. Yes No N/A 3. Weir plate plumb and its top and edges sharp and clean. Yes No N/A 4. Downstream edge of weir is chamfered at 45°. Yes No N/A 5. Free access for air below the nappe of the weir. a. Samples refrigerated during compositing. Yes No N/A 6. Upstream channel of weir straight for at least four times the depth of water level and free from disturbances. Yes No N/A 7. Distance form sides of weir to side of channel at least 2H.			Sides of flume throat vertical and parallel. Yes NO N/A	
Yes		7.		
Yes X No N/A 10. Flume operating under free-flow conditions over existing range of flows. Yes X No N/A 11. Flume submerged under certain flow conditions. Yes No X N/A 12. Flume operation invariably free-flow. Yes X No N/A Weirs 1. What type of weir is being used? Yes No N/A 2. Weir exactly level. Yes No N/A 3. Weir plate plumb and its top and edges sharp and clean. Yes No N/A 4. Downstream edge of weir is chamfered at 45°. Yes No N/A 5. Free access for air below the nappe of the weir. a. Samples refrigerated during compositing. Yes No N/A 6. Upstream channel of weir straight for at least four times the depth of water level and free from disturbances. Yes No N/A X 7. Distance form sides of weir to side of channel at least 2H.		8.		
11. Flume submerged under certain flow conditions. Yes NO N/A 12. Flume operation invariably free-flow. Yes NO N/A Weirs 1. What type of weir is being used? Yes NO N/A 2. Weir exactly level. Yes NO N/A 3. Weir plate plumb and its top and edges sharp and clean. Yes NO N/A 4. Downstream edge of weir is chamfered at 45°. Yes NO N/A 5. Free access for air below the nappe of the weir. a. Samples refrigerated during compositing. Yes NO N/A 6. Upstream channel of weir straight for at least four times the depth of water level and free from disturbances. Yes NO N/A 7. Distance form sides of weir to side of channel at least 2H.		9.		
Yes		10.		e of flows.
Weirs 1. What type of weir is being used? Yes No N/A		11.		
1. What type of weir is being used? Yes NO N/A		12.	. Flume operation invariably free-flow. Yes No N/A	
Yes No N/A			Weirs	
Yes No N/A		1.	What type of weir is being used? Yes No N/A	
4. Downstream edge of weir is chamfered at 45°. Yes No N/A Yes No N/A 5. Free access for air below the nappe of the weir. a. Samples refrigerated during compositing. Yes No N/A 6. Upstream channel of weir straight for at least four times the depth of water level and free from disturbances. Yes No N/A 7. Distance form sides of weir to side of channel at least 2H.		2.		
Yes No N/AX 5. Free access for air below the nappe of the weir. a. Samples refrigerated during compositing. Yes No N/AX 6. Upstream channel of weir straight for at least four times the depth of water level and free from disturbances. Yes No N/AX 7. Distance form sides of weir to side of channel at least 2H.		3.		
a. Samples refrigerated during compositing. Yes No N/A X 6. Upstream channel of weir straight for at least four times the depth of water level and free from disturbances. Yes No N/A X 7. Distance form sides of weir to side of channel at least 2H.		4.	Downstream edge of weir is chamfered at 45°. Yes NO N/AX	
Yes No N/A _X 6. Upstream channel of weir straight for at least four times the depth of water level and free from disturbances. Yes No N/A _X 7. Distance form sides of weir to side of channel at least 2H.	W	5.	Free access for air below the nappe of the weir.	
6. Upstream channel of weir straight for at least four times the depth of water level and free from disturbances. Yes NO N/A			a. Samples refrigerated during compositing. Yes No N/A _X	
7. Distance form sides of weir to side of channel at least 2H.		6.	Upstream channel of weir straight for at least four times the water level and free from disturbances.	depth of
			165	

.

8.	Area of approach channel at least (8 x nappe a 2a) for upstream distance of 15H.
	Yes No N/A _X
9.	If not, is velocity of approach too high? Yes No N/AX
10	. Head measurements properly made by facility personnel. Yes No N/AX
11	Yes No N/A
12	. Proper flow tables used by facility personnel. Yes No N/A
	Other Flow Devices
1.	Type of flowmeter used: Totalizer
2.	What are the most common problems that the operator has had with the flowmeter? None
3.	Measured wastewater flow:
	Calibration and Maintenance
1.	Flow totalizer properly calibrated. Yes No N/A
2.	Frequency of routine inspection by proper operator:/day.
3.	Measured wastewater flow: A/A mgd; Recorded flow:
4.	Flowmeter calibration records kept. Yes No N/A
	Frequency of flowmeter calibration:/month.year
5.	Flow measurement equipment adequate to handle expected ranges of flow rates. Yes X No N/A
6.	Calibration frequency adequate.
••	Yes _ K No N/A
	Laboratory Procedures
1.	EPA-approved analytical testing procedures used and on-hand. (written) Yes X NO N/A N/A
2.	If alternate analytical procedures used, proper approval obtained. Yes X No N/A

3	Yes X No N/A N/A
4	Yes X No N/A N/A
5	. QA procedures used. YesX No N/A
	. QC procedures adequate. Yes No N/A
7	. Duplicate samples analyzed when having aboutine.
8	. Spiked samples used every (the sof time.
9 . Na	Yes X NO N/A There Bonner Analytical Testing Company (there's only)
	Adress 2703 Oak Grove Pd., Hattierburg, MS 39402
	ontact Michael S. Bonner, Ph. J.
Ph	one 264-2854
Ce	rtification #
	Laboratory Facilities and Equipment
1.	Proper grade laboratory pure water available for specific analysis. Yes No N/A
2.	Dry, uncontaminated compressed air available. Yes No N/A
3.	Fume hood sufficiently ventilated. YesX No N/A
4.	Yes NO N/A
5.	Adequate electrical sources available. Yes X No N/A N/A
6.	Instruments/equipment in good condition. Yes No N/A
7.	Written requirements for daily operation of instruments available. YesX No N/A
8.	Standards and appropriate blanks available to perform daily check procedures. Yes No N/A

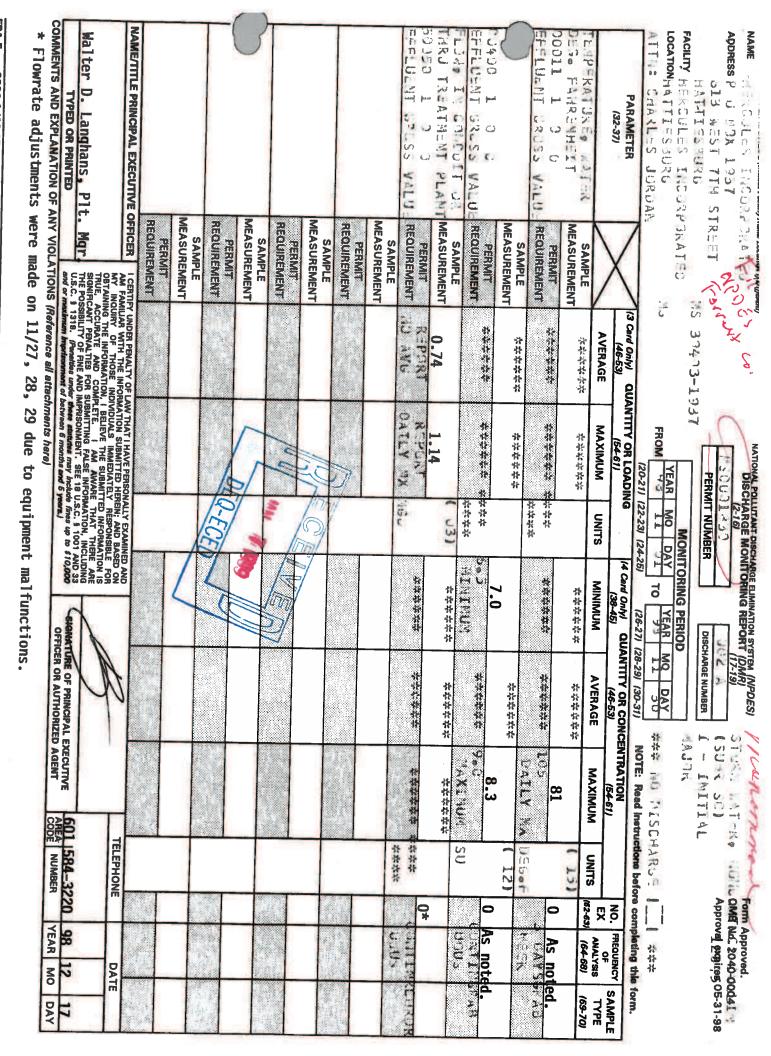
9	Yes _ K NO N/A
1	.0. Schedule for required maintenance exists. Yes X No N/A
1	1. Proper volumetric glassware used. Yes _ / No N/A
1	2. Glassware properly cleaned. Yes No N/A
13	3. Standard reagents and solvents properly stored. Yes No N/A
14	Working standard frequently checked. Yes X No N/A
15	
16	
17	. Written procedures exists for cleanup, hazard response methods, and applications of correction methods for reagents and solvents.
18	Yes No N/A Gas cylinders replaced at 100-200 psi. 500 psi.
	Laboratory's Precision, Accuracy, and Control Procedures
1.	Multiple replicates (blanks, duplicates, spikes, and splits) analyzed for each type of control check and information recorded. Yes No N/A
2.	Plotted precision and accuracy control methods used to determine whether valid, questionable, or invalid data are being generated from day to day. YesX NO N/A
3.	Control samples introduced into the train of actual samples to ensure that valid data are being generated. Yes No N/A
4.	Precision and accuracy of the analyses are sufficient. Yes
	Data Handling and Reporting
1	Round-off rules uniformly applied.
••	Yes No N/A
2.	Significant figures established for each analysis. Yes X No N/A

3.	Provision for Oss-checking calculation used Yes No N/A	
4.	Correct formulas used to calculate final results. Yes X No N/A N/A	
5.	Control chart approach and statistical calculations for QC and report available and followed. Yes No N/A	
6.		
7.	Data reported in proper form and units. Yes No N/A	
8.	Laboratory records readily available to regulatory agency for required time of 3 years. Yes No N/A	
9.	Laboratory notebook or pre-printed data forms bound permanently to proving good documentation.	ide
	Yes _ X No _ N/A	
10.	Efficient filing system exists, enabling prompt channeling of report copies.	
	Yes No N/A	
	Laboratory Personnel	
1.	Enough analysts present to perform the analyses necessary. Yes X No N/A	
2.	Analysts have on hand the necessary references for EPA procedures being used.	
	Yes _X No N/A	
3.	Analysts trained in procedures performed through formal or informal training or certification programs. YesX No N/A	
	Tes X NO N/A	
Com	ments:	_
	·	
	•. • #6	
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COMMENTS AND EXPLANATION OF ANY VIOLATIONS (Reference all attachments here) Walter D. Langhans, Plt. Mgr. NAME/TITLE PRINCIPAL EXECUTIVE OFFICER LOCATION HATTIES URS FACILITY AUTOCLIS THOUSEUR ATED ITOOG 55150 -171 EFFLUENT DEG. FAJRENHEIT ADDRESS P G BOX 1737 NAME TREATMENT PLANT MEASUREMENT TO TABLET OF THE Flowrate adjustments were made on 12/7,9,10, 11 due to equipment malfunction. I MATTIESSUR SIS WEST TIH SIR CIT MELCULES INCOMP CATED TYPED OR PRINTED **PARAMETER** LIMONES CROSS JURUA VALU . MEASUREMENT MEASUREMENT REQUIREMENT REQUIREMENT MEASUREMENT REQUIREMENT MEASUREMENT REQUIREMENT REQUIREMENT REQUIREMENT MEASUREMENT REQUIREMENT MEASUREMENT SAMPLE PERMIT SAMPLE PERMIT PERMIT SAMPLE SAMPLE SAMPLE PERMIT SAMPLE SAMPLE PERMIT PERMIT PERMIT I CERTIFY UNDER PENALTY OF LAW THAT! HAVE PERSONALLY EXAMINED AND AM FAMILIAR WITH THE INFORMATION SUBMITTED HEREIN; AND BASED ON MY INCULIRY OF THOSE INDIVIDUALS IMMEDIATELY RESPONSIBLE FOR OBTAINING THE INFORMATION, I BELIEVE THE SUBMITTED INFORMATION IS TRUE, ACCUPATE AND COMPLETE. I AM AVVARE THAT THERE ARE SIGNIFICANT PENALTIES FOR SUBMITTING FALSE INFORMATION, INCLUDING THE POSSIBILITY OF FINE AND IMPRISONMENT. SEE 18 U.S.C. \$ 1001 AND 33 U.S.C. \$ 1318. [Physioles under these setures may include fines up to \$10,000 and or maximum imprisonment of between 6 months and 6 years.) 3 (3 Card Only) QUANTITY OR LOADING NU AYS K=PORT かけなかない *** 57413-1937 **AVERAGE** 行行行行行行 特於特殊特殊 0.90 XF ATIVG KUPUNI 你你你你你你 在你你你 非非特殊的 经存货品 MAXIMUM FROM 1.70 特特特特特特 并持持持持持 DISCHARGE MONITORING REPORT (DMR)
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EPA Form 3320-1 (08-95) Previous editions may be used.

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COMMENTS AND EXPLANATION OF ANY VIOLATIONS (Reference all attachments here) Walter D. NAME/TITLE PRINCIPAL EXECUTIVE OFFICER LOCATION HATTLES UPS EFFLUE WE 00560 NAME SEFT OF THE ADDRESS ; XTR.-טכנים HRU TREATMENT PLANT MEASUREMENT + 964 0310 C 149 9 しまないことの FFLUEN in in Line 679 PENDED (20 S-CAY MERCULES INCURPONATED OLS MEST TIT CIRCLE PLP C. TILTH SASASE (FINE A) TYPED OR PRINTED CHAKLES JORD PARAMETER 0E9. 1 Langhans, Plt. Col-> THOUSENS, TS METHITOT PC BRUSS COX 1937 4. SE LITO -IINGRO D.S. REQUIREMENT MEASUREMENT MEASUREMENT REQUIREMENT REQUIREMENT REQUIREMENT MEASUREMENT MEASUREMENT REQUIREMENT REQUIREMENT MEASUREMENT REQUIREMENT MEASUREMENT SAMPLE SAMPLE SAMPLE PERMIT PERMIT SAMPLE SAMPLE SAMPLE SAMPLE PERMIT PERMIT PERMIT PERMIT I CERTIFY UNDER PENALTY OF LAW THAT I HAVE PERSONALLY EXAMINED AND AM FAMILIAR WITH THE INFORMATION SUBMITTED HEREIN; AND BASED ON MY INQUIRY OF THOSE INDIVIDUALS IMMEDIATELY RESPONSIBLE FOR TRUE, ACCURATE AND COMPLETE. I AM SWARE THAT THERE ARE SIGNIFICANT PENALTIES FOR SUBMITTING FALSE INFORMATION, INCLUDING THE POSSIBILITY OF FINE AND IMPRISONMENT. SEE 18 U.S.C. \$ 1001 AND 33 U.S.C. \$ 1318. (Physical Residual Complete C 5 i 000 (3 Card Only) QUANTITY OR LOADING (46-53) *10 x V6 OAN C 30 AVG 1244 KPUKI 0.63 34473-1957 **AVERAGE** 0.4 111 AVG 155 AW 527 990 900 DAILY NX DAILY 557 ATIFO DAILY 大いていたい FROM MAXIMUM 1611 0.80 0.8 515 378 NATIONAL POLLUTANT DISCHARGE ELIMINATION SYSTEM (NPDES)
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EPA Form 3320-1 (08-95) Previous editions may be used.

(REPLACES EPA FORM T-40 WHICH MAY NOT BE USED.) 00105/980115-1137

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COMMENTS AND EXPLANATION OF ANY VIOLATIONS (Reference all attachments here) Walter D. NAME/TITLE PRINCIPAL EXECUTIVE OFFICER EFFLUENT 6 20 TH 34534 LOCATION HAFTIES -UES NAME ADDRESS P FACILITY ないこ OMPOUN FFLUENT HENDE 9 L350 VIK. FELUE N 550 JOK'S d 1000 En! TREATMENT Y DU-C A-ROULES INCURPONATED HATTI SE UNG 613 WEST TH STREET WENT COLORS L'ACURTURALES 1 CHARLES TYPED OR PRINTED PARAMETER Langhans, U1177 8 TETAL 54085 S CONTRACTOR 53X 1937 WETH) TOT PRE LINCPE (TREGN PLANT Plt. 5 MEASUREMENT REQUIREMENT MEASUREMENT MEASUREMENT MEASUREMENT MEASUREMENT Mgr. RECUIREMENT REQUIREMENT REQUIREMENT REQUIREMENT REQUIREMENT MEASUREMENT REQUIREMENT MEASUREMENT SAMPLE PERMIT SAMPLE SAMPLE SAMPLE SAMPLE SAMPLE PERMIT SAMPLE PERMIT PERMIT PERMIT PERMIT I CERTIFY UNDER PENALTY OF LAW THAT! HAVE PERSONALLY EXAMINED AND AM FAMILLAR WITH THE INFORMATION SUBMITTED HEREN; AND BASED ON MY INQUIRY OF THOSE INDVIDUALS IMMEDIATELY RESPONSBLE FOR OBTAINING THE INFORMATION, I BELIEVE THE SUBMITTED INFORMATION IS TRUE, ACCURATE AND COMPLETE. I AM AWARE THAT THERE ARE SIGNIFICANT PENALTIES FOR SUBMITTING FALSE INFORMATION, INCLUDING THE POSSIBILITY OF FINE AND INFORMATION FALSE INFORMATION, INCLUDING U.S.C. \$ 1318. Prematice under these statutes may include lines up to \$10,000, and or maximum impatienment of between 6 months and 6 years.) (3 Card Only) (46-53) 0 PU AVG 1344 SAV OR Č YU 476 N. Post 0.510.1 448 **AVERAGE** 299 3403-1937 AVE 22 ልምሪ QUANTITY OR LOADING 000 395 22 DAILY MX 507 ATING 0.111 DAILY DAILY CA 0.64 スーセールー MAXIMUM 0.4 FROM 1651 726 NATIONAL POLLUTANT DISCHARGE ELMINATION SYSTEM (NIPDES)
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Flowrate adjustments were made on 8/4, 9, 15 due to equipment malfunction.

COMMENTS AND EXPLANATION OF ANY VIOLATIONS (Reference all attachments here) FACILITY MENCULES INCORPORATED LOCATIONHATTLES URG ADDRESS P NAME Walter D. Langhans, Plt. NAME/TITLE PRINCIPAL EXECUTIVE OFFICER DEG. FARRINHEIT ERMITTEE NAME/ADDRESS (Include Facility Name/Location if Different) 10011 FFLUENT (2.50 TREATMENT PLANT MEASUREMENT 0400 L"P"KATUK", KATER Elect FFLUERO MENTULES INCORPORTED (r) just (y) MATTIESCURG INCHO! CHARLES PARAMETER TYPED OR PRINTED TIN TER 53055 JRUS J JK 1737 Ċ SUL TON VALUE MALL C STREET REQUIREMENT MEASUREMENT MEASUREMENT MEASUREMENT REQUIREMENT REQUIREMENT MEASUREMENT MEASUREMENT MEASUREMENT REQUIREMENT REQUIREMENT REQUIREMENT REMENT SAMPLE SAMPLE SAMPLE PERMIT SAMPLE SAMPLE SAMPLE SAMPLE PERMIT PERMIT PERMIT PERMIT PERMIT PERMIT I CERTITY UNDER PENALTY OF LAW THAT I HAVE PERSONALLY EXAMINED AND AM FAMILIAR WITH THE INFORMATION SUBMITTED HERITS, AND BASED ON MY INQUIRY OF THOSE INDIVIDUALS IMMEDIATELY RESPONSIBLE FOR OBTAINING THE INFORMATION, I BELIEVE THE SUBMITTED INFORMATION IS TRUE, ACCURATE AND COMPLETE. I AM AWARE THAT THERE ARE SIGNIFICANT PENALTIES FOR SUBMITTING FALSE INFORMATION, INCLUDING THE POSSIBILITY OF FINE AND IMPRISONMENT. SEE 18 U.S.C. \$ 1001 AND 33 U.S.C. \$ 1318. Physical and or maximum imprisonment of between 8 months and 6 years.) NS 39403-1937 c (3 Card Only) QUANTITY OR LOADING (46-53) (54-61) SAY OF NEPCK! 计计算特殊特 经济特种特殊 **AVERAGE** *** 特特特特特特 0.87 DAILY IX 大学でした ******** 种种种种种种 MAXIMUM FROM 1.29 好好好好好好 於於於於於於 NATIONAL POLLUTANT DISCHARGE ELIMINATION SYSTEM (NPDES)
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^{*} Flowrate adjustmens were made on 7/23, 24 due to equipment malfunctions.

COMMENTS AND EXPLANATION OF ANY VIOLATIONS (Reference all attachments here) FACILITY HENCULES INCORPORATES LOCATION。日本学学生与多少之中 ADDRESS P 😅 Walter D. Langhans, Plt. NAME/TITLE PRINCIPAL EXECUTIVE OFFICER ELECTION I ATTUS CHARLES JURDAN TERMITIEE NAME/AUDRESS (Include Facility Name/Location ([Different) FFLUCN HRS TREATMENT PLANT MEASUREMENT FFLUENT DMPOUND KIRa-IA IL & GNEWSE (FREGN 950 FFLUCNI 2503 6777 STOLE ! FFLUENT 1050 プロバワルコ AVOLC HATTLESPURU 613 PEST TIH THE SOULT OF THE PRINTED IN COMPUT **PARAMETER** TYPED OR PRINTED VETA) TUTORC SSUKE 1151 GRUSS LEGI NC 32055 TAL RUSS VELU (STREAT MEASUREMENT MEASUREMENT MEASUREMENT REQUIREMENT MEASUREMENT REQUIREMENT REQUIREMENT REQUIREMENT REQUIREMENT REQUIREMENT MEASUREMENT REQUIREMENT MEASUREMENT SAMPLE SAMPLE SAMPLE PERMIT SAMPLE SAMPLE SAMPLE SAMPLE PERMIT PERMIT PERMIT PERMIT PERMIT I CERTIFY UNDER PENALTY OF LAW THAT I HAVE PERSONALLY EXAMINED AND AM FAMILIAR WITH THE INFORMATION SUBMITTED HERIEI; AND BASED ON MY INQUIRY OF THOSE INDIVIDUALS IMMEDIATELY RESPONSIBLE FOR OBTAINING THE INFORMATION, I BELIEVE THE SUBMITTED INFORMATION IS TRUE, ACCURATE AND COMPLETE, I AM AWARE THAT THERE ARE SIGNIFICANT PENALTIES FOR SUBMITTING FALSE INFORMATION, INCLUDING THE POSSIBILITY OF FINE AND IMPRISONMENT. SEE 18 U.S.C. \$ 1001 AND 33 U.S.C. \$ 1318. Provide under these sections may forcide fines up to \$10,000 and or maximum important of between \$6 months and \$6 years.) U (3 Cerd Only) (46-53) č č Č i. 244 REPURT 39433-1937 **AVERAGE** AVE AVE AVG 0.59 AVG AVS 1.8 359 394 60 QUANTITY OR LOADING 366 222 DAILY MX ATINC DAILY MAILY 0.88 6.5 PAILY されている FROM **MAXIMUM** 2000 132 NATIONAL POLLUTANT DISCHARGE ELMINATION SYSTEM (NPDES)
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COMMENTS AND EXPLANATION OF ANY VIOLATIONS (Reference all attachments here)

COMMENTS AND EXPLANATION OF ANY VIOLATIONS (Reference all attachments here) NAME/TITLE PRINCIPAL EXECUTIVE OFFICER NAME LOCATIONHATTIES 3933 ADDRESS P FFFLUEN いてよいい TECOC) T. 76 Flowrate adjustments were made on 7/2,3,6,7,8,9,10 due to equipment malfunctions. J. F. Walter D. Langhans, 0350 T349 INTERNATIONS NATION FAMRENTHELT HERCULES INCURPORATED TREATHENT HENCULES INCORPONATED MATTIESHUNG olo dest Tid LINCUCS VI PARAMETER TYPED OR PRINTED HARLES _DX 1937 3888 LO JA PLANT C Plt. Mgr MEASUREMENT MEASUREMENT MEASUREMENT MEASUREMENT REQUIREMENT REQUIREMENT REQUIREMENT REQUIREMENT MEASUREMENT REQUIREMENT REQUIREMENT MEASUREMENT MEASUREMENT REQUIREMENT SAMPLE SAMPLE SAMPLE PERMIT SAMPLE SAMPLE SAMPLE PERMIT PERMIT PERMIT PERMIT PERMIT PERMIT SAMPLE AM FAMILIAR WITH THE INFORMATION SUBMITTED HEBIT; AND BASED ON MY INQUIRY OF THOSE INDIVIDUALS IMMEDIATELY RESPONSIBLE FOR OBTAINING THE INFORMATION, I BELIEVE THE SUBMITTED INFORMATION IS THUE. ACCURATE AND COMPLETE. AM AWARE THAT THERE ARE SIGNIFICANT PENALTIES FOR SUBMITTING FALSE INFORMATION, INCLUDING THE POSSIBILITY OF FINE AND INFORMATION. INCLUDING THE POSSIBILITY OF FINE AND IMPRISONMENT. SEE 18 U.S.C. \$ 1001 AND 33 U.S.C. \$ 1319. Physical Procession of The Possibility of Fine AND IMPRISONMENT. SEE 18 U.S.C. \$ 1001 AND 33 U.S.C. \$ 1319. Physical Research of The Possibility of Fine AND IMPRISONMENT. SEE 18 U.S.C. \$ 1001 AND 33 U.S.C. \$ 1319. Physical Research of The Possibility of Fine AND IMPRISONMENT. SEE 18 U.S.C. \$ 1001 AND 33 U.S.C. \$ 1001 AND 35 U.S.C. \$ 1001 AN 100 1 (3 Card Only) QUANTITY OR LOADING SAY PAR KEPURT 好典者特替於 中部社会会会 39403-1937 **AVERAGE** 外外外外外外外 0.90 DAILY YX 势於各种特殊 1.43 特特特特特特 特 FROM MAXIMUM 特替特特特特 我好於於於於 NATIONAL POLLUTANT DISCHARGE ELMINATION SYSTEM (NIPDES)
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COMMENTS AND EXPLANATION OF ANY VIOLATIONS (Reference all attachments here) LOCATION HATTIES URG FACILITY HENCULLS INCURPORATED NAME NAME/TITLE PRINCIPAL EXECUTIVE OFFICER ADDRESS P C SOX 1737 ATT . DIAXLES JURUAN TERMIT I EE NAME/AUDHESS (Include Facility Name/Location (fD(form)) THE TREATMENT PLANT MEASUREMENT -FELUENT TOOC Walter D. EGO FAMRENHEIT 000 LICENCE IN CONCULT ENTERATURES MATER いちいい HATTIFYTUES ofs For 7TH STRIFT **PARAMETER** FOULTS INCOSPURATED TYPED OR PRINTED 175 SU Langhans, Plt. Mgr VALU VALUE MEASUREMENT MEASUREMENT MEASUREMENT REQUIREMENT REQUIREMENT REQUIREMENT REQUIREMENT MEASUREMENT MEASUREMENT REQUIREMENT REQUIREMENT MEASUREMENT REQUIREMENT SAMPLE SAMPLE SAMPLE SAMPLE PERMIT PERMIT PERMIT PERMIT SAMPLE PERMIT SAMPLE PERMIT SAMPLE PERMIT I CERTIFY UNDER PENALTY OF LAW THAT I HAVE PERSONALLY EXAMINED AND AM FAMILIAR WITH THE INFORMATION SUBMITTED HEREN; AND BASED ON MY INQUIRTY OF THOSE INDIVIDUALS IMMEDIATELY RESPONSIBLE FOR OBTAINING THE INFORMATION, I BELIEVE THE SUBMITTED INFORMATION IS TRUE, ACCURATE AND COMPLETE. I AM ANVARE THAT THERE ARE SIGNIFICANT PENALTIES FOR SUBMITTING FALSE INFORMATION, INCLUDING THE POSSIBILITY OF FINE AND IMPRISONMENT. SEE 18 U.S.C. \$ 1001 AND 30 U.S.C. \$ 1318. Promises under these structus may include lines up to \$10,000 and or maximum impolerament of between 8 months and 8 years.) i is. (3 Card Only) (46-53) MC AVE というのえて 0.78 39403-1957 经投资的投资 经营养业品 **AVERAGE** 科科於於於特殊 计计计计计计 QUANTITY OR LOADING DAILY MK KEPOK! **林林林林林** 我你要你你你 生行分分 FROM MAXIMUM 1.57 外於於於於於於 特於特於於於 NATIONAL POLLUTANT DISCHARGE ELIMINATION SYSTEM (NPDES)
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Flowrate adjustments were made on 5/2,3,4,5,6,7, and 29 due to equipment malfunction.

COMMENTS AND EXPLANATION OF ANY VIOLATIONS (Reference all attachments here) Walter NAME/TITLE PRINCIPAL EXECUTIVE OFFICER LOCATION HE ITIES BURG FACILITY HENCULES INCURPORATED KILDAPHNIA HAJE A GGC FFLULVIT CSO STAT HAL ---HATTIES 3URG 513 MEST 7TH STREET THE STANDER RATED CHARLES JURDAN TYPED OR PRINTED PARAMETER Langhans, Pit. SSI S SSISS SOX LOST 404 0 36 48 VALUE me commit remain received it riflerent) -MEASUREMENT MEASUREMENT REQUIREMENT MEASUREMENT MEASUREMENT MEASUREMENT MEASUREMENT REQUIREMENT REQUIREMENT REQUIREMENT REQUIREMENT MEASUREMENT RECUIREMENT REQUIREMENT SAMPLE PERMIT SAMPLE SAMPLE PERMIT PERMIT SAMPLE SAMPLE SAMPLE SAMPLE PERMIT PERMIT PERMIT PERMIT I CERTIFY UNDER PENALTY OF LAW THAT I HAVE PERSONALLY EXAMINED AND AM FAMILLAR WITH THE INFORMATION SUBMITTED HEREN; AND BASED ON MY INQUIRTY OF THOSE INDIVIDUALS IMMEDIATELY RESPONSIBLE FOR OBTAINING THE INFORMATION, I BELIEVE THE SUBMITTED INFORMATION BY TRUE, ACCURATE AND COMPLETE. I AM AWARE THAT THERE ARE SIGNIFICANT PENALTIES FOR SUBMITTING FALSE INFORMATION, INCLUDING THE POSSIBILITY OF FINE AND INPRISONMENT. SEE IB U.S.C. \$ 1001 AND 30 U.S.C. \$ 1318. (Penalties under these statutes may include fines up to \$10,000 and or maximum imprisonment of between 6 months and 6 years.) (01 U (3 Card Only) QUANTITY OR LOADING (46-53) **经经济外接款 计算特殊的** 39463-1937 **AVERAGE 特於特殊特勢** 经外债外债 特特特特特特 特特特特特 FROM MAXIMUM 特於於於於於 **林於於於於於於於** NATIONAL POLLUTANT DISCHARGE ELIMINATION SYSTEM (NPDES)
DISCHARGE MONITORING REPORT (DMR)
(2-16) (20-21) (22-23) (24-25) YEAR 0001350 PERMIT NUMBER を ササナ 神子 かか ္ လ လ 好好好好 好好好好 SLINA **MONITORING PERIOD** DAY (4 Card Only) QUANTITY OR CONCENTRATION (56-63) Ü *U TI NO MIN 100.0 100.0 MINIMUM 징 YEAR MO (26-27) (28-29) (30-31) SIGNATURE OF PRINCIPAL EXECUTIVE OFFICER OR AUTHORIZED AGENT DISCHARGE NUMBER 602 经特别的 **教育特殊教育 AVERAGE** DAY 外科科科外於 外外外外外外 *** IL OISUH . SOF いとして I - INITIAL (50% St) DIUSSAY PERUINENOMBNO. 2040-0004 NOTE: Read instructions before completing this form. **** MAXIMUM **** 於於於於於於於 好好好好好好 (54-61) AREA NUMBER TELEPHONE (23) (23) 11170 U. SLING Approval expires 05-31-98 Form Approved. (62-63) **M** NO. FREQUENCY 0 98 YEAR As noted. ANALYSIS (64-68) As noted. . |-07 DATE <u>₹</u> C..P24 7 G C SAMPLE (69-70) DAY

COMMENTS AND EXPLANATION OF ANY VIOLATIONS (Reference all attachments here) NAME/TITLE PRINCIPAL EXECUTIVE OFFICER LOCATION HAITIES SURV 10580 Walter D. Langhans, FELUE 100) A3 .. O. .. 9 88 L XC 1937 HEROSELE INCURPERATED BATTICS USE SID WEST TIM CHARLES TYPED OR PRINTED PARAMETER Call Figure Cal DRUH HALL JUSDAN MEASUREMENT MEASUREMENT MEASUREMENT RECUIREMENT REQUIREMENT REQUIREMENT REQUIREMENT MEASUREMENT MEASUREMENT REQUIREMENT MEASUREMENT REQUIREMENT MEASUREMENT REQUIREMENT SAMPLE PERMIT PERMIT SAMPLE SAMPLE SAMPLE SAMPLE BERMIT PERMIT SAMPLE SAMPLE PERMIT PRANT PERMIT I CERTIFY UNDER PENALTY OF LAW THAT! HAVE PERSONALLY EXAMINED AND AM FAMILLAR WITH THE INFORMATION SUBMITTED HEREN; AND BASED ON MY INQUIRY OF THOSE INDIVIDUALS IMMEDIATELY RESPONSIBLE FOR OBTAINING THE INFORMATION, I BELIEVE THE SUBMITTED INFORMATION IS SIGNIFICANT PENALTIES FOR SUBMITTING FALSE INFORMATION, INCLUDING THE POSSIBILITY OF FINE AND INFORMATION FALSE INFORMATION, INCLUDING U.S.C. \$ 1318. [Financial under these statutes may include fines up to \$10,000 and or maximum imprisonment of between 6 months and 6 years.] 3 501.3 (3 Card Only) QUANTITY OR LOADING 39403-1937 **AVERAGE** 176 ě ORTA SAX MAXIMUM FROM 216 NATIONAL POLLUTANT DISCHARGE ELMINATION SYSTEM (NPDES)
DISCHARGE MONITORING REPORT (DMR)
(2-16) >0001830 (20-21) (22-23) (24-25) YEAR MO DAY 90 PERMIT NUMBER L83/6Y 94 SLINA 100 MONITORING PERIOD (4 Cand Only) QUANTITY OR CONCENTRATION (54-4) 特別的特別 70 MINIMUM 外外外外外外 YEAR MO (26-27) (28-29) (30-31) OFFICER OR AUTHORIZED AGENT DISCHARGE NUMBER 007 C **特特特性特殊 AVERAGE** DAY 特於特於特於 WHY NO DISCHARGE ! HA JOS I - INLTIAL (SURK SIJ) PRUC: 35 PAST W. T. QMB No. 2040-0004 NOTE: Read instructions before completing this form. MAXIMUM **特性特殊** 於於於於於於 O1 584-3220 AREA NUMBER TELEPHONE 於於於 2 1998 科科科科 SLING Approval expires 05-31-98 Form Approved. (62-63) NO. FREQUENCY SAMPLE YEAR (64-68) As noted 98 DATE N_O (69-70) DAY

COMMENTS AND EXPLANATION OF ANY VIOLATIONS (Reference all attachments here) NAME FACILITY HEKEDILLS ENCURPOKATED ADDRESS P NAME/TITLE PRINCIPAL EXECUTIVE OFFICER LOCATION HAFTI:3 UTG 11000 ATTAL CHARL Walter 6 P. F. J. I SE SATUR O SA ESO FAHRENHEIT HATTE JUNG clo a ST 771 STO T C Levide Dal C-7. CM PARAMETER TYPED OR PRINTED Langhans, Plt. 25 T 337 THE WIT PLANT MEASUREMENT me cacmil rame rocation il rillatati CR MEASUREMENT MEASUREMENT MEASUREMENT MEASUREMENT REQUIREMENT MEASUREMENT REQUIREMENT REQUIREMENT REQUIREMENT REQUIREMENT MEASUREMENT REQUIREMENT REQUIREMENT SAMPLE SAMPLE SAMPLE SAMPLE SAMPLE PERMIT PERMIT PERMIT PERMIT PERMIT SAMPLE SAMPLE PERMIT CERTIFY UNDER PENALTY OF LAW THAT I HAVE PERSONALLY EXAMINED AND AM FAMILIAR WITH THE INFORMATION SUBMITTED HERBIR, AND BASED ON MY INQUIRY OF THOSE INDIVIDUALS IMMEDIATELY RESPONSIBLE FOR OBTAINING THE INFORMATION, I BELIEVE THE SUBMITTED INFORMATION IS TRUE. ACCURATE AND COMPLETE. I AM AWARE THAT THERE AND COMPLETE. I AM AWARE THAT THERE AND INFORMATION, IS SIGNIFICANT PENALTIES FOR SUBMITTING FALSE INFORMATION, INCLUDING THE POSSIBILITY OF FINE AND IMPRISONMENT. SEE 18 U.S.C. \$ 1001 AND 33 U.S.C. \$ 131. (Phanible under those statutes may include fines up to \$10,000 and or maximum inquisionment of between 6 months and 5 years.) Ü ; (3 Card Only) (46-53) NEPTAT 39403-1937 **装物料料料料** 外班上外外景 **AVERAGE** 0.86 特特特特特特 特於特殊特勢 QUANTITY OR LOADING 31.9CH **特特特特特特** FROM **并以并外外外** MAXIMUM 好好好好好好 经共享共享 NATIONAL POLLUTANT DISCHARGE ELIMINATION SYSTEM (NPDES)
DISCHARGE MONITORING REPORT (DMR)
(2-16) (20-21) (22-23) (24-25) YEAR MO DAY PERMIT NUMBER 0001830 大学は 160 你特件计 计计特件 STINU 331 MONITORING PERIOD C (4 Card Only) QUANTITY OR CONCENTRATION (58-45) (46-53) MINIAUS 70 骨骨骨骨骨骨骨 **特许林沙林沙** MINIMUM 於於於於於於於 并於特殊於於 9 .9 YEAR 93 (26-27) (28-29) (30-31) SIGNATURE OF PRINCIPAL EXECUTIVE OFFICER OR AUTHORIZED AGENT DISCHARGE NUMBER 0-12 A M N 我特外於特殊 特殊作品作品 好かな かかかか **AVERAGE** 特特特特特特 计科特特特 特特特特特特 WASH IND DICCINPLE でうしつ人 THITTINE - I (SUNK 53) UTLR. ATTK9 NOTE: Read instructions before completing this form. 100 A III K LAXE SUPE **MAXIMUM** 於特殊發發於 特特特特特特 86 本本本本 TELEPHONE 95647 我好好好 SLING Form Approved. 584-3220 NUMBER 12) نسر ال **ا** Approval expires 05-31-98 (62-63) M Š O 0 0 O YEAR FREQUENCY As noted. ANALYSIS (64-68) UUU5 0.00 As noted. 98 NI IN WILL かかか As noted. 12 Y 읶 DATE S ال دو دو i i SAMPLE (69-70) TYPE DAY

COMMENTS AND EXPLANATION OF ANY VIOLATIONS (Reference all attachments here) NAME LOCATION A FILE SUCTO EACHTY PERCEPTE THOUSE TREE NAME/TITLE PRINCIPAL EXECUTIVE OFFICER EFFLUEN ADDRESS 🏸 20000 - COW P かんのから 00500 EFFLUENT Walter D. THE TREATMENT XTR. PHINCE A CHECKADO びいいの CHOMB 4 HEE INAMEINUUNESS (Inches racilly Name Location () Different) Increased hydraulic loading due to heavy rainfall. AVG-C HATTIESSURG olo 国Cut TIH CHARLES JURUAN mudL : PARAMETER TYPED OR PRINTED 0 = 0 0 Langhans, Plt. BOX 1957 ASE (FILE JY METHITUT, RC COMMIT ENCURPINAL T PLANTMEASUREMENT 57 MEASUREMENT MEASUREMENT REQUIREMENT REQUIREMENT MEASUREMENT REQUIREMENT MEASUREMENT REQUIREMENT REQUIREMENT MEASUREMENT REQUIREMENT REQUIREMENT MEASUREMENT SAMPLE SAMPLE PERMIT SAMPLE SAMPLE PERMIT PERMIT PERMIT SAMPLE PERMIT SAMPLE PERMIT SAMPLE PERMIT I CERTIFY UNDER PENALTY OF LAW THAT I HAVE PERSONALLY EXAMINED AND AM FAMILIAR WITH THE INFORMATION SUBMITTED HERIEI; AND BASED ON MY INQUIRY OF THOSE INDIVIDUALS IMMEDIATELY RESPONSIBLE FOR OBTAINING THE INFORMATION, I BELIEVE THE SUBMITTED INFORMATION IS TRUE, ACCURATE AND COMPLETE. I AM AWARE THAT THERE ARE SIGNIFICANT PENALTIES FOR SUBMITTING FALSE INFORMATION, INCLUDING THE POSSIBILITY OF FINE AND IMPRISONMENT. SEE 18 U.S.C. \$ 1001 AND 33 U.S.C. \$ 1318. (Premisson when the see settings may forcide fines up to \$10,000 and or maximum imprisonment of between 8 months and \$ years.) . (3 Card Only) (46-53) d i 5 244 130 A V NEPOKI 37473-1737 0.711115 **AVERAGE** 2.9 AVIO AVG 175 1116 AWG ၽ QUANTITY OR LOADING 322 50 NE ATIVO ATIMO DAILY "IK DATLY ATIVE K POX MAXIMUM 1.37 10.3 FROM 4776 400 NATIONAL POLLUTANT DISCHARGE ELMINATION SYSTEM (NPDES)
DISCHARGE MONITORING REPORT (DMR)
(2-16) 99 WS0001830 A. 20-21) (22-23) 10 YEAR PERMIT NUMBER Ç Mo 1.60 85/3Y SLIND 15/0 13 261 26) 100 60) **MONITORING PERIOD** (4 Card Only) QUANTITY OR CONCENTRATION (58-45) (46-53) *** 70 **有外外外外外** 化分替特种物 经营业 MINIMUM 於於於於於於 外外外外外外 计科科特特的 特特特特特特 特特特特特特 YEAR 9. (26-27) (28-29) (30-31) OFFICER OR AUTHORIZED AGENT DISCHARGE NUMBER C) MO 4 计分类计算计算 **** 特外外外外 *** 经外外的分类 **AVERAGE** 於於於於於於於 特特特特特特 **计算特殊的 计设计计计** · 持持特特特特 *** NO DISCHARGE MAJUR I - IMETIAL (SUUR ST) PW. C. S. JAJ TEJAT DMB No. 2040-0004 NOTE: Read instructions before completing this form. MAXIMUM 計場於於於其於 **分类的种类的** 经验按验检检 特特特特特特 特特特特特特 好情於於於於 好好好好好 特特特特特特 **特长特特特特** 特殊於於於於於 601 584-3220 が行行 TELEPHONE が大大 항 항 항 计计计 *** 特特特特 **特特特** 安外的公 特特特特 於特殊於 STIND NUMBER Approval expires 05-31-98 Form Approved. (62-63) 찟 0 0 0 YEAR FREQUENCY JUU'S As noted. As noted. As noted. As not As noted. ANALYSIS (64-68) 98 PAYS: THE PARTY PIX SAVO UKYSI かない LIL LAT 윾 DATE S O 0.924 () () () S. W. S. SAMPLE (69-70) 08

EFFLUENT COMMENTS AND EXPLANATION OF ANY VIOLATIONS (Reference all attachments here. DE3. 56050 NAME/TITLE PRINCIPAL EXECUTIVE OFFICER EFFLUENT THRU ATTNE FACILITY HERCULES INCORPORATED ADDRESS P O HOX 1937 LOCATIONHATTIESBURG PERMITTEE NAME/ADDRESS (Include Feetlity Name/Location of Dig Flowrate adjustment was made on 1/20/98 due to equipment malfunction. Walter D. Langhans, Plt. EMPERATURE, WATER FAHRENHEIT TREATMENT PLANTMEASUREMENT IENT GROSS HERCULES INCORPORATED 613 WEST 7TH STREET HATTIESBURG IN CONDUIT CHARLES JORDAN PARAMETER TYPED OR PRINTED GRUSS VALUE REQUIREMENT VALUE REQUIREMENT UR MEASUREMENT MEASUREMENT REQUIREMENT MEASUREMENT MEASUREMENT MEASUREMENT MEASUREMENT REQUIREMENT REQUIREMENT REQUIREMENT REQUIREMENT PERMIT SAMPLE SAMPLE SAMPLE SAMPLE SAMPLE SAMPLE PERMIT PERMIT PERMIT PERMIT SAMPLE PERMIT I CENTIFY UNDER INDIALTY OF LAW THAT I HAVE PERSONALLY EXAMINED AND AAK FAMILLAR WITH THE INFORMATION SUBMITTED HERBIN, AND EASED ON MY INQUIRY OF THOSE INCUMULALS MINEDIATELY RESPONSIBLE FOR OBTAINING THE INFORMATION, I BELIEVE THE SUBMITTED INFORMATION IS TRUE, ACCUMUTE AND COMPLETE. I AM AWARE THAT THERE ARE SIGNIFICANT PENALTIES FOR SUBMITTION FALSE INFORMATION, INCLUDING THE POSSIBLITY OF FINE AND IMPRISONMENT. SEE 18 U.S.C. J 1001 AND 33 U.S.C. I 1318, PANAMES LINES SEENERS MEY INCIDENCE AND 10 10,000 š. S 13 Card Only) (4C-53) MO AYG REPORT 1.42 **** 39403-1937 特殊於特特特 AVERAGE *** *** QUANTITY OR LOADING DAILY MX REPORT 作件外外外外 *** MAXIMUM FROM 4.64 ** *** MS0001830 UUZ A (20-21) (22-23) (24-26) XEAB B PERMIT NUMBER **** ** MGU , Ko ** *** SLIND 03) MONITORING PERIOD DAY T (4 Card Only) QUANTITY OR CONCENTRATION (84-63) MUNIMUM 7.0 なななななななな **** 5 MUMM *** **** (26-27) (28-29) (30-31) OFFICER OR AUTHORIZED AGENT DISCHARGE NUMBER d§ åq なななななな 长春春春春春 **AVERAGE** XVG XVG *** *** *** *** NO DISCHARGE BALOR STORM WATER, (SUBR SO) NOTE: Read instructions before completing this form. - INITIAL 9.0 107 *** MAXIMUM DAILY & .3 MAXIMUM **** 75 Š 601,584-3220 TELEPHONE *** US DEG.F *** SLINA NUMBER NUNC SWE MC 2045-8644I N 12) 15) Ī Approval 2006/05-31-98 (62-63) 3 0 0 0 S O **m** YEAR DOUT INGRAB 98 Snon ANALYSIS (64-68) FREQUENCY **DIN 1 I NRC DKD** XHIIX As noted. As noted. As notied. 计计计 DAYSERAB DATE 8 02 SAMPLE (69-70) DAY

COMMENTS AND EXPLANATION OF ANY VIOLATIONS (Reference all attachments here) NAME/TITLE PRINCIPAL EXECUTIVE OFFICER LOCATION HATTIES AURG FACILITY HENCULES INCURPORATED ADDRESS P 0 LOX 1937 NAME OF THE PURITIES (Include Facility Name/ Location () Different) SPELUENT 00011 Walter D. Langhans, Plt. -00400 130 TAIL 0350 EG. FAMRENH-IT こでである。 いんちゅう HATTIES OURG SIS SEST TIH STRL-T CHARLES JURUAN TYPED OR PRINTED PARAMETER ATREAT PLANT MEASUREMENT いえしのい (32-37)52355 2055 F CI.TOWN VALUE REQUIREMENT MEASUREMENT MEASUREMENT REQUIRENTENT REQUIREMENT MEASUREMENT REQUIREMENT REQUIREMENT MEASUREMENT REQUIREMENT MEASUREMENT MEASUREMENT REQUIREMENT SAMPLE SAMPLE SAMPLE SAMPLE PERMIT SAMPLE PERMIT PERMIT SAMPLE RAMI PERMIT SAMPLE PERMIT PERMIT I CERTIFY UNDER PENALTY OF LAW THAT! HAVE PERSONALLY EXAMINED AND AM FAMILLAR WITH THE INFORMATION SUBMITTED HEREN; AND BASED ON AMY INQUIRY OF THOSE INDIVIDUALS IMMEDIATELY RESPONSIBLE FOR OBTAINING THE INFORMATION, I BELIEVE THE SUBMITTED INFORMATION IS BURNET THE SUBMITTED INFORMATION IS SIGNIFICANT PENALTIES FOR SUBMITTING FALSE INFORMATION, INCLUDING THE POSSIBILITY OF FINE AND IMPRISONMENT. SEE 18 U.S.C. \$ 1001 AND 33 and or maximum imprisonment of between 6 months and 6 years.) Yorks 39403-1957 Ü (3 Card Only) QUANTITY OR LOADING (46-53) SAY DE KLYON 化合物 计操作 **外操作技术** 0.83 **AVERAGE** 特於於於於於 *** DAILY KEPORT 特许特益特殊 特殊特许特別 FROM MAXIMUM 於如好於於於 特於於於於於 NATIONAL POLLUTANT DISCHARGE ELIMINATION SYSTEM (NPDES)
DISCHARGE MONITORING REPORT (DMR)
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(17-19) (20-21) (22-23) (24-25) PERMIT NUMBER **** 整行行於 76. 外於於於 计计计计 Tro DAY STIND 13) **MONITORING PERIOD** • 14 Card Only) QUANTITY OR CONCENTRATION MINITE 70 **计分替状态外** **** MINIMUM 特特於特特於 特特特特特 7.2 (38-45)YEAR MO DAY (26-27) (28-29) (30-31) SPRICER OF PRINCIPAL EXECUTIVE OFFICER OR AUTHORIZED AGENT DISCHARGE NUMBER **特什特特的 AVERAGE** *** **** 於於於於於於 分科科科科科 特特特特特特 *** NO OISCHARGE EALOK STUG (Süek ST) I - INITIAL NOTE: Read instructions before completing this form. ¥0 3 DAILY 7.9 MAXIMUM 李林寺 李林寺 FIRSTAN 计计计计计 84 WATER COMBING 2040-00041 N > 601 584-3220 TELEPHONE 於於於 5 7.030 **特林於於** NUMBER SLING 12) 15) (62-63) Approval expires 05-31-98 NO. 쯧 0 FREQUENCY OF ANALYSIS I) (64-68) 98 YEAR **300**0 JETIN As notted. As notied. As notied. SAYC DATE So 2 133 14 13 * # # W SAMPLE (69-70) DAY 16

COMMENTS AND EXPLANATION OF ANY VIOLATIONS (Reference all attachments here) LOCATION A TTI -5 UNG FACILITY HENCULES INCURPORATIO NAME Walter NAME/TITLE PRINCIPAL EXECUTIVE OFFICER F-0.69 EXTROPIN MARTLUMNT ATTILE CHARLES JURUA! ADDRESS P U TERMITIEE NAME/AUURESS (Include Facility Name/Location (fD)(formi) VIL & GREASS (FREDY T. C. DIFOUND STONE P 5560 0360 6 2000 FFLUER FELUENT 4534 FFLUENT IBS, TOTAL での返む形し (KO)255. THE ROUTE TAPERRED TRUATMENT AVOLG OLS SEET THE STREET PARIATE SARA D. þ... IN COMPUIT PARAMETER TYPED OR PRINTED SINGLE METH) TOTO ROMEASUREMENT Langhans, Plt. SSUSS 53 10% 1937 03LS5 GROSS VALUE PLANTMEASUREMENT VALUE NO MEASUREMENT MEASUREMENT REQUIREMENT MEASUREMENT REQUIREMENT REQUIREMENT REQUIREMENT REQUIREMENT RECUIREMENT MEASUREMENT REQUIREMENT MEASUREMENT SAMPLE PERMIT SAMPLE SAMPLE PERMIT SAMPLE PERMIT SAMPLE SAMPLE PERMIT PERMIT SAMPLE PERMIT PERMIT I CERTIFY UNDER PENALTY OF LAW THAT I HAVE PERSONALLY EXAMINED AND AM FAMILIAR WITH THE INFORMATION SUBMITTED HEBRIC; AND BASED ON MY INCULIFY OF THOSE INDIVIDUALS IMMEDIATELY RESPONSIBLE FOR OBTAINING THE INFORMATION, I BELIEVE THE SUBMITTED INFORMATION IS THUE, ACCURATE AND COMPLETE. I AM AWARE THAT THERE ARE SIGNIFICANT PENALTIES FOR SUBMITTING FALSE INFORMATION, INCLUDING THE POSSIBILITY OF FINE AND IMPRISONMENT. SEE 18 U.S.C. \$ 1001 AND 33 U.S.C. \$ 1318. (Frankless early bease statings may include fines up to \$10,000 and or maximum imprisonment of botween 6 months and 6 years.) ī. U (3 Cerd Only) (46-53) 35 AAR OF Ë 244 MJ AVE 39403-1937 からていた。 0.84 260 AVERAGE 0.2 446 AVG 768 AVO 26 QUANTITY OR LOADING 0 00 990 2327 <u>ي</u> د DAILY DATLY DALLY ON DAILY DAILY REPORT FROM **MAXIMUM** 1.61 1430 0.9 77 571 NATIONAL POLLUTANT DISCHARGE ELMINATION SYSTEM (NPDES)
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(2-16) COETIONS X 20-21) (22-23) (24-25) Ž PERMIT NUMBER 160 10/SE AC/SE ES/01 JO O BS/DY STINU S. C. 26) 261 26) 26) MONITORING PERIOD (4 Card Only) QUANTITY OR CONCENTRATION *** *** # # # # # # # # # *** 5 **** MINIMUM 於你特特於於 计科特特特法 外外外外外外外 特殊特特特特 作於於於於於 (38-45)YEAR MO (26-27) (28-29) (30-31) SIGNATURE OF PRINCIPAL EXECUTIVE OFFICER OR AUTHORIZED AGENT DISCHARGE NUMBER TEO 科特性科特特 分件物件的特 好好好好好好 **特特特特特** **** **AVERAGE** PAY AG 外外外外外外 持持於行於於 於於於於於於 持续持续持持 (46-53) ササガ 163 DISCHAPGE | | サササ 語とし口が PRUCESS MAST WAT SMB No. 2040-0004 (SUAN SH) NOTE: Read instructions before completing this form. - IMITIAL MAXIMUM **计操作性数** ***** *** **** 有特殊特殊特 外外外外外外 并於於於於於 好好好好好 *** 经营营营营营 601 584-3220 AREA NUMBER TELEPHONE 於計計 好於好 かかかい *** がなかい 特特特特 於於於於 经经外经 **사사사** 经特许许 Form Approved. NO. PREQUENCY OF ANALYSIS Approval ektrires 05-31-98 0 0 0 0 98 YEAR THE CREST As noted. 教育が大 As noted. ANALYSIS (64-68) エフルス As noted As noted As noted. 976101 SAVO SAVE DAYS DATE 2 8 2265 7 7 0 SAMPLE 169-701 DAY

COMMENTS AND EXPLANATION OF ANY VIOLATIONS (Reference all attachments here) Walter D. LOCATION HATTIES .U.S. 6 FACILITY MERCULES INCURPORATED ATT . CHAKLES JUP. NAME/TITLE PRINCIPAL EXECUTIVE OFFICER ERIUDAPHMIA THE LUCKT MASS I FFLUMNT A10 74 326 PHALES ESP L LOX 1937 STAT ASSET HATTIESSUNG DIS MEST TIM STREET THE STATE OF THE S NAME/ADDRESS (Include Facility Name/Location if Different) **PARAMETER** TYPED OR PRINTED Langhans, Plt. りのよう S ار () () 100 NO LO C MEASUREMENT MEASUREMENT MEASUREMENT REQUIREMENT REQUIREMENT MEASUREMENT REQUIREMENT MEASUREMENT REQUIREMENT MEASUREMENT RECUIRENENT REQUIREMENT REQUIREMENT MEASUREMENT SAMPLE SAMPLE SAMPLE SAMPLE SAMPLE SAMPLE PERMIT PERMIT PERMIT SAMPLE PERMIT PERMIT PERMIT PERMIT AM FAMILIAR WITH THE INFORMATION SUBMITTED HERICAL EXAMINED AND AM FAMILIAR WITH THE INFORMATION SUBMITTED HERIC; AND BASED ON MY INQUIRY OF THOSE INDIVIDUALS IMMEDIATELY RESPONSIBLE FOR OBTAINING THE INFORMATION, I BELIEVE THE SUBMITTED INFORMATION IS TRUE, ACCURATE AND COMPLETE. I AM AWARE THAT THERE ARE SIGNIFICANT PENALTIES FOR SUBMITTING FALSE INFORMATION, INCLUDING THE POSSIBILITY OF FINE AND IMPRISONMENT. SEE 18 U.S.C. \$ 1001 AND 33 U.S.C. \$ 1318. (Premises and information may faciled fines up to \$10,000 and or maximum imparisonment of between 6 months and 6 years.) C 3 (3 Card Only) QUANTITY OR LOADING (46-53) (54-61) 39403-1937 有公子 特殊 计分字 化子子 **AVERAGE 特特特特特** *** 计操作操作器 医经营性 MAXIMUM FROM *** **经验证的** 好好好好好好 NATIONAL POLLUTANT DISCHARGE ELIMINATION SYSTEM (NIPDES)
DISCHARGE MONITORING REPORT (DMR)
[17-19]
DISCIDENT STATEMENT (17-19) YEAR (20-21) (22-23) (24-25) PERMIT NUMBER 然次外外 MO DAY ** 作件分件 STIND MONITORING PERIOD 14 Card Only) QUANTITY OR CONCENTRATION 0. MIN OF KIN OM 70 MINIMUM 15.6 13.4 (38-45)YEAR MO (26-27) (28-29) (30-31) SIGNATURE OF PRINCIPAL EXECUTIVE OFFICER OR AUTHORIZED AGENT DISCHARGE NUMBER **** **经济外外外 AVERAGE** J 特特於特特特 特於於於於於 *** NO DISCHARGE |__| MAJOR TELLE (SCUK MI) TUASSAY REQUIRE ADME No. 2040-0004 NOTE: Read instructions before completing this form. MAXIMUM ***** **经投资基本** 本本本本本本本 *** 601 584-3220 TELEPHONE 1111 CENT Capa (23) 1 (23) NUMBER SLING Form Approved. Approved exglines 05-31-98 (62-63) E õ YEAR As noted. ANALYSIS (64-68) HEQUENCY As noted. 98 1217 禁禁禁 윾 2 DATE S 0.0 7000 SAMPLE (69-70) DAY

COMMENTS AND EXPLANATION OF ANY VIOLATIONS (Reference all attachments here) NAME/TITLE PRINCIPAL EXECUTIVE OFFICER 50750 Walter D. Langhans, Plt. Mgr 00011 LOCATION HATTIES BURG FACILITY HENCOLES INCURPONATED 00400 FFFLUMNI MADSS DEG. FAHRENHEIT ADDRESS P U DJK 1937 BRU TREATMENT : DIATURE FE 859 SATTICE BURG 613 HEST TIH STREET ALAGULES. TYPED OR PRINTED CHARLES PARAMETER CONDUE るるころ PLANTMEASUREMENT Cat Willer Con Day JURDAN 717 MEASUREMENT REQUIREMENT MEASUREMENT REQUIREMENT MEASUREMENT REQUIREMENT MEASUREMENT REQUIREMENT REQUIREMENT MEASUREMENT MEASUREMENT REQUIREMENT REQUIREMENT SAMPLE SAMPLE PERMIT PERMIT PERMIT SAMPLE SAMPLE SAMPLE PERMIT PERMIT PERMIT SAMPLE SAMPLE PERMIT I CERTIFY UNDER PENALTY OF LAW THAT! HAVE PERSONALLY EXAMINED AND AM FAMILLAR WITH THE INFORMATION SUBMITTED HEREN; AND BASED ON MY INQUIRTY OF THOSE INDIVIDUALS IMMEDIATELY RESPONSIBLE FOR THUE, ACCURATE AND COMPLETE. I AM AWARE THAT THERE AND COMPLETE. I AM AWARE THAT THERE AND INSTRUMENTIND FALSE INFORMATION, INCLUDING THE POSSIBILITY OF FINE AND IMPRISONMENT. SEE 18 U.S.C. \$ 1001 AND 38 and or maximum imprisonment of between 6 months and 6 years.) G (3 Card Only) TU AVS KEPOKT 0.98 计计算计算计算 **共享申申公共** 39403-1937 AVERAGE 好好好好好 外外於於於於 QUANTITY OR LOADING DAILY AX ストていみず 2,43 **特别的特别** 并亦非非非什 MAXIMUM FROM 好好好好好好 かおかかかか NATIONAL POLLUTANT DISCHARGE ELMINATION SYSTEM (NPDES)
DISCHARGE MONITORING REPORT (DMR)
(2-16) (20-21) 20001830 YEAR 0 PERMIT NUMBER **** *** 1150 於於於於 **教教教**书 (22-23) (24-25) MO DAY STINU J31 MONITORING PERIOD (4 Card Only) QUANTITY OR CONCENTRATION ů MINI STATE 70 MUMINIM 特於於於於於 特特特特特特 (38-45) YEAR MO SIGNATURE OF PRINCIPAL EXECUTIVE OFFICER OR AUTHORIZED AGENT (26-27) (28-29) (30-31) DISCHARGE NUMBER 7 700 特特特特特特 **有种软件价价 计算设计分**数 AVERAGE 计分对外标件 外外好好好好 外外外外外外 3/16/58 *** NO DISCHARGE |__| アムジス T - INTITAL (SUBA SU) STUP BATHON TONE DIMENO, 2040-00041 NOTE: Read instructions before completing this form. 9.0 100 7.6 JAILY ... X *** AKING MAXIMUM 各种特殊特殊 77 601 | 584-3220 TELEPHONE 操作品 NUMBER 公於公計 DEG.F 50 SLING 121 1 (62-63) Approval projitas 05-31-98 Form Approved. 0 0 NO. PREQUENCY 贸 YEAR 98 As noted. 3000 As noted. ON TAN SISATUM ** As noted. (64-68)). ** 03 DATE ₹ O SAMPLE DAY 16 (69-70)

Flowrate adjustments were made on 2/13,14,15,23,25 due to equipment malfunction.

EPA Form 3320-1 (08-95) Previous editions may be used.

(REPLACES EPA FORM T-40 WHICH MAY NOT BE USED.)

USED.) 00098/980115-1137

PAGE 10F

COMMENTS AND EXPLANATION OF ANY VIOLATIONS (Reference all attachments here) Walter D. NAME/TITLE PRINCIPAL EXECUTIVE OFFICER TIRL FACILITY HENCULES INCORPORATED -LJuy 34594 LOCATIONHATTIESSURG ADDRESS P 🕾 NAME 22500 CAPOLAGO HENDL. FFLUENT 0530 6310 TRo-LUEME PENDED LESO TITAL TREATMENT AUTIC OLD MEST 7TH STREET HATTIFSSURG NEACCE E ENGASE IN COMPAI IN MEIN TUTORC CHARLES TYPED OR PRINTED PARAMETER 1 5 ° SINS Langhans, Plt. 32555 30X 1937 . (FREUN LACORPOXATIO PLANT MEASUREMENT MEASUREMENT REQUIREMENT MEASUREMENT REQUIREMENT REQUIREMENT REQUIREMENT MEASUREMENT REQUIREMENT MEASUREMENT MEASUREMENT REQUIREMENT MEASUREMENT REQUIREMENT SAMPLE SAMPLE SAMPLE PERMIT PERMIT SAMPLE PERMIT PERMIT SAMPLE PERMIT SAMPLE SAMPLE PERMIT PERMIT I CERTIFY UNDER PENALTY OF LAW THAT! HAVE PERSONALLY EXAMINED AND AM FAMILIAR WITH THE INFORMATION \$UBMITTED HEREIN; AND BASED ON MY INQUIRY OF THOSE INDIVIOUALS IMMEDIATELY RESPONSIBLE FOR OBTAINING THE INFORMATION, I BELIEVE THE SUBMITTED INFORMATION IS TRUE, ACCURATE AND COMPLETE.

SIGNIFICANT PENALTIES FOR SUBMITTING FALSE INFORMATION, INCLUDING THE POSSIBILITY OF FINE AND IMPRISONMENT. SEE 18 U.S.C. \$ 1001 AND 33 U.S.C. \$ 1318. (Panables under bhase statims may include fines up to \$10,000 and or maximum impaisonment of between 6 months and 6 years.) 5 į. 303 DAY OF 0000 (3 Card Only) QUANTITY OR LOADING (46-53) ċ 24 MU AVG 39403-1937 AVERAGE 0.94 AVU AYG 1.5 AYG 232 380 69 OpC 990 5 DAILY YX DAILY 20 - POW MAXIMUM FROM **284** 620 . 35 747 NATIONAL POLLUTANT DISCHARGE ELMINATION SYSTEM (NPDES)
DISCHARGE MONITORING REPORT (DMR)
(2-16) 5 NSCC1830 (20-21) (22-23) (24-25) YEAR MO × X ž 5.5 PERMIT NUMBER NG D 型S/07 STINU 3/01 231 157 0/0 26) 26) 26) YG/2 **MONITORING PERIOD** DAY (4 Card Only) QUANTITY OR CONCENTRATION (58-45) **林安林安林**本 各於於於於於 於於於於於於於 计计程计程序 经营营营业 MINIMUM 7 各特特特特特 公林特特特於 **计外科科科** 计分科的计 神经神经神经 YEAR MO (26-27) (28-29) (30-31) OFFICER OR AUTHORIZED AGENT DISCHARGE NUMBER 100 我将本教教育 23 经会外外外 **分外外任任任** *** **经营业业** AVERAGE DAY 於於於於於於 **公社会会会会** 於於於於於於 并於於於於於於 特於特特特特 46-53 3/11/8 TOWNSTO DISCHARGE きるとロス I - INITIAL (SUER 50) PRICESS WASTERNT OMB No. 2040-0004 NOTE: Read instructions before completing this form. **MAXIMUM** 本非常非常本 ******* 好好好好好 特殊分子特殊 外外外外外外 **特特特特特特** 计计计计计计 好於於於於於於 特特特特特特 特於特於特於 AREA NUMBER 等行於於 TELEPHONE · 安安林 計算が *** 사사사 好好好好 好好好好 * 格林公子 科特特公 有情情情 SLING Approval expires 05-31-98 Form Approved. 0 0 (62-63) . O **m** YEAR 98 TO US As noted. As noted. As noted PREQUENCY ST TX As noted. As noted. SISATYNY 1111 SAVO SAVO (64-68) 724:0184¥0 () × **特外**特 DATE 03 **M**O • ·Zdati SAMPLE (69-70) DAY TYPE 16

LOCATIONHA TITE FACILITY BEACULES INCURPOASTED ADDRESS 1 PERMITTEE NAME/ADDRESS (Include Facility Name/Location (f Different) ATTIO CHARLES JURUAN 34594 FLC35 EXTRO-IN UTER Waiter D. Langhans, Plt. NAME/TITLE PRINCIPAL EXECUTIVE OFFICER これで 2550 3 77 0530 DMPOUND HENOL V THEUTH FFLUENT SPENDED T FLUENT Flowrate adjustments were made on 1/25,26,27,28 due to equality of the property of the state of (20 0ES. TREATMENT D-JAY HATTLESSURG 613 WEST TIN SERCULES. 原元のかのな PARAMETER TYPED OR PRINTED ST HOLE TELE YES THE TOT OF L LIGGNOOLT BRUSS 52255 A LISS . 「竹の」して LICERPINATED PLANT MALUE VAL III STRESI MEASUREMENT MEASUREMENT MEASUREMENT REQUIREMENT REQUIREMENT REQUIREMENT REQUIREMENT MEASUREMENT REQUIREMENT MEASUREMENT MEASUREMENT **MEASUREMENT** REQUIREMENT REQUIREMENT SAMPLE SAMPLE SAMPLE SAMPLE SAMPLE SAMPLE SAMPLE PERMIT PERMIT PERMIT PERMIT PERMIT PERMIT PERMIT I CERTIFY UNDER PENALTY OF LAW THAT! HAVE PERSONALLY EX ASED ON AM FAMILIAR WITH THE INFORMATION BUBMITTED HERBIT, ANNESIBLE FOR MY INQUIRY OF THOSE INDIVIDUALS IMMEDIATELY RESPINATION IS OF ALIEVE THE SUBMITTED INFORMATION IS THE ALIEVE THE SUBMITTEN INFORMATION IS THE ACCURATE AND COMPLETE. AM AWARE THE THERE ARE SIGNIFICANT PENALTIES FOR SUBMITTING FALSE INFORMATION, INCLUDING THE FOOSSIBILITY OF FINE AND IMPRISONMENT. SEE IS U.S.C. a. 1318. Provides under Marches and factor for \$10,000 and or maximum imprinorment of between 6 months and 6 years. V. 550 (3 Card Only) (46-53) 190 OFF MU AVG BU AVE NU AVE JU AVG 39403-1937 BEKERT **AVERAGE** 485 628 1.24 1.6 N V G 78 QUANTITY OR LOADING 765 000 322 DWI ATINO VALLY MAILY DAILY FROM × 2.58 ယ 1076 1356 MAXIMUM NATIONAL POLLUTANT DISCHARGE ELMINATION SYSTEM (NPDES)
DISCHARGE MONITORING REPORT (DMR)
(12-18) でによ (20-21) (22-23) (24-25) X. YEAR MO COMPOSI ¥ ,... ,... PERMIT NUMBER FIGU STINU 35/U' 35/0 31 261 251 (0) 26) MONITORING DAY (4 Card Only) (38-45) 70 计特种特特特 各位体体体体 经特殊的行行 **有特殊各种条件** 好好好好好好 MINIMUM 本本本本本本本 *** 特特特特特特 清我的教徒於 **经济经济经济** YEAR MO PERIOD (26-27) (28-29) (30-31) SIGNATURE OF PRINCIPAL EXECUTIVE OFFICER OR AUTHORIZED AGENT QUANTITY OR CONCENTRATION DISCHARGE NUMBER COL 2 特特化特特特 好你好好你 分外的分分分数 **AVERAGE** 於持於神外於 DAY 水水水水水水 **替替好价格** 外外外外外外 **公社会会会 特特特教教教** とかしロス 安泰林 NO DISCHARGE I - INITIAL PROCESS MASTER T OMB No. 2040-0004 Sud NOTE: Read instructions before completing this form. MAXIMUM *** 学者各种会员 **分替收收收** 本本中中本本 **计计计计符件** 4 北北北北北北 特特特特特特 共 持 大 共 共 六 **特特特特特特** 特殊特殊特殊 93 601,584-3220 ながない 好好好 おおか ササかか 竹竹竹竹 告替各 ** TELEPHONE 作品品品 中华各种 大学時代 456 STIND NUMBER Form Approved. Approval expires 05-31-98 (62-63) Z O 2 6 0 0 0 0 0 FREQUENCY YEAR MO 3 98 ANALYSIS S. T. L. C. JAYS (64-68) TOTAL X DAYS SAVO As noted. As noted. As nated. As noted. As noted. PYS ٩ GL DATE DARK Z 6 * C SAMPLE TO MAN 240 (69-70) DAY

COMMENTS AND EXPLANATION OF ANY VIOLATIONS (Reference all attachments here)

(REPLACES EPA FO RM T-40 WHICH MAY NOT BE USED.)

PAGE

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ADDRESS 🟱 FACILITY HENCULES INCORPURATED NAME LOCATIONHATTIESSURG PERMITTEE NAME/ADDRESS (Include Facility Name/Location if Different) COMMENTS AND EXPLANATION OF ANY VIOLATIONS (Reference all attachments here) 56050 SPECULAT EFFLUENT 00011 NAME/TITLE PRINCIPAL EXECUTIVE OFFICER 6777 L R 1230 FAHRLMHELT - OLU NE - PERATURED ANT Wälter D. Langhans, Plt. TREATMENT PLANT MEASUREMENT THE STATE OF THE S HATTIESE URG ols MEST 774 STREET CHARLES JURUAN PARAMETER TYPED OR PRINTED 000 GEUSS (32-37)JUN 1937 SPUSS O C LIDEL 7 して REQUIREMENT REQUIREMENT REQUIREMENT MEASUREMENT MEASUREMENT MEASUREMENT MEASUREMENT MEASUREMENT REQUIREMENT MEASUREMENT REQUIREMENT REQUIREMENT SAMPLE SAMPLE PERMIT SAMPLE SAMPLE SAMPLE SAMPLE SAMPLE PERMIT PERMIT PERMIT PERMIT PERMIT PERMIT CERTIFY UNDER PENALTY OF LAW THAT I HAVE PERSONALLY EXAMINED AND AM FAMILLAR WITH THE INFORMATION SUBMITTED HERBIY, AND BASED ON MY INQUIRY OF THOSE INCIDENCE THE SUBMITTED INFORMATION IS OFFICIALLY RESPONSIBLE FOR OFFICIAL REPORT AND COMPLETE. I AM AWARE THAT THERE ARE SIGNIFICANT PENALTIES FOR SUBMITTING FALSE INFORMATION, INCLUDING THE POSSIBILITY OF FINE AND IMPRISONMENT. SEE 18 U.S.C. \$ 1001 AND 33 U.S.C. \$ 1319. (Pranthe under hose stature may include fines up to \$10,000 and or maximum imprisonment of between 6 months and 6 years.) 5 (3 Card Only) (46-53) O AVG 39403-1937 スいて白ル 1.42 **** **AVERAGE** 於於於於於於於 特於於於於於 QUANTITY OR LOADING DAILY BX KAPOKI MAXIMUM 野母等野野野 经对价价 计外部操作法 经分件计 FROM 弘并於於於於 **** -64 NATIONAL POLLUTANT DISCHARGE ELMINATION SYSTEM (NPDES)
DISCHARGE MONITORING REPORT (DMR)
(2-16) CESTOOCS YEAR (20-21) (22-23) (24-25) PERMIT NUMBER 300 特特法特 经外价的 STINU MONITORING PERIOD 0 (4 Card Only) QUANTITY OR CONCENTRATION (54-45) (46-53) WOLTH IN 7.0 To 本ななななない *** MINIMUM 特特特特特特 於於於於於於 TEAR NO DAY (26-27) (28-29) (30-31) DISCHARGE NUMBER 700 × OFFICER OR AUTHORIZED AGENT AVERAGE *** **特特特特特特** *** **经验的价格** アンとつか WAR NO DISCHARGE I INTIAL (5058 57) Form Approved. らている。 おきてきゅうこのMB No. 2040-000441 NOTE: Read instructions before completing this form. LOS "LYKL" ATING ထ MAXIMUM 安全等於於於於 *** 75 * CODE NUMBER 601 | 584 - 3220 *** TELEPHONE Chica in S · 公外外外 SLINA 12) FV Approval expires 05-31-98 (62-63) щ N 0 0 0 100 X FREQUENCY ANALYSIS (64-68) 特特特 YEAR 98 THE LET As notied. NIIN As noticed. As noted. DATE ₹ O 02 , t 1 5. JA A S いっことに SAMPLE (69-70) TYPE

(REPLACES EPA FORM T-40 WHICH MAY NOT BE USED.)

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02

Flowrate adjustment was made on 1/20/98 due to equipment malfunction.

NAME COMMENTS AND EXPLANATION OF ANY VIOLATIONS (Reference all attachments here) LOCATIONHATTIESBURG FACILITY HERCULES INCORPORATED ADDRESS P U BOX 1937 BODy PERMITTEE NAME/ADDRESS (Include Facility Name/Location if Different) 00310 EFFLUENT GROSS 50050 NAME/TITLE PRINCIPAL EXECUTIVE OFFICER EFFLUENT THRU TREATMENT PLANT MEASUREMENT LOW IN CONDUIT OR 0560 0530 4694 GNDGMO HENOLO SINGLE FFLUENT KTRo-IR METHITOTORC IL & GREASE (FREON FFLUENT GROSS VALUE Walter PENDED IDS, TOTAL (20 DEG. 5-DAY HERCULES INCORPORATED 613 MEST TTH HATTIESBURG CHARLES PARAMETER D. Langhans, Plt. TYPED OR PRINTED (32-37) GROSS GROSS VALUE GROSS 9 JUROAN STREET MEASUREMENT MEASUREMENT REQUIREMENT MEASUREMENT REQUIREMENT REQUIREMENT MEASUREMENT REQUIREMENT REQUIREMENT MEASUREMENT MEASUREMENT REQUIREMENT REQUIREMENT SAMPLE SAMPLE SAMPLE SAMPLE SAMPLE SAMPLE SAMPLE PERMIT PERMIT PERMIT PERMIT PERMIT PERMIT PERMIT CERTIFY UNDER PENALTY OF LAW THAT HAVE PERSONALLY EXAMINED AND AM FAMILIAR WITH THE INFORMATION SUBMITTED HERBIY, AND BASED ON MY INQUIRY OF THOSE INDIVIDUALS IMMEDIATELY RESPONSIBLE FOR DETAINING THE INFORMATION, I BELIEVE THE SUBMITTED INFORMATION IS TRUE, ACCURATE AND COMPLETE. AM AWARE THAT THERE ARE SIGNIFICANT PENALTIES FOR SUBMITTING FALSE INFORMATION, INCLUDING THE POSSIBILITY OF FINE AND IMPRISONMENT. SEE 18 U.S.C. \$ 1001 AND 33 U.S.C. \$ 1310. Physibis under these statems may include fines up to \$10,000 and or meximum imprisonment of between 6 months and 5 year.] SS SS (3 Card Only) (46-53) 560 NO AVE 1 0 W 11/6 39403-1937 REPORT AVERAGE 416 725 1.19 1.5 53 QUANTITY OR LOADING 990 22.63 500 DATE: IX DATLY DATILY DAILY MX REPORT MAXIMUM FROM 2.8 1660 1.91 1045 NATIONAL POLLUTANT DISCHARGE ELMINATION SYSTEM (NPDES)
DISCHARGE MONITORING REPORT (DMR)
(17-19) 96 MS0001830 YEAR 97 120-211 122-231 124-251 PERMIT NUMBER MGD RS/DY BS/DY BS/DY BS/DY STIND 031 261 26) 26) 26) MONITORING PERIOD (4 Card Only) QUANTITY OR CONCENTRATION (54-63) MINIMUM 5 **保存价价价价** *** **计公共分价的** *** **特性特殊特殊** *** 特特特特特特 YEAR MO 97 12 126-27) 128-29) 130-31) OFFICER OR AUTHORIZED AGENT DISCHARGE NUMBER 001 A **** *** **AVERAGE 始势势势势** 学学学学学学 *** DAY 31 各种特种特殊 传传传传传传 *** ** NOTE: Read Instructions before completing this form MAJOR-I - INITIAL (SUBR SO) PROCESS WASTEWATERMB No. 2040-0004
Approval STEP 5-31-98 MAXIMUM **** **特特特特特特 骨骨骨骨骨 计算结构设计** 李安安李安安 **** **传传传传传** *** 中華本本中 AREA NUMBER 601584-3220 ** 特特特 *** TELEPHONE **特勢勢勢** SLINA Form Approved. NO. EX 0 0 0 0 ANALYSIS (64-68) PREQUENCY IN I IND YEAR 98 HEEK. MESK. As notted FIEL As noted As notted As noted As notted DAYSGRAB DAYSCOMPZA DAYSCOMP24 DAYSGRAB DATE No REORDA SAMPLE (69-70) DAY 19

00096/971017-1034

ADDRESS P U BOX 1937 613 WEST 7TH FACILITY HERCULES INCORPORATED NAME LOCATIONHATTIESBURG PERMITTEE NAME/ADDRESS (Include Facility Name/Location if Different) COMMENTS AND EXPLANATION OF ANY VIOLATIONS (Reference all attachments here) 50050 EFFLUENT 00400 EFFLUENT GROSS DEG. FAHRENHEIT EFFLUENT THRU TREATMENT PLANT MEASUREMENT FLOW, IN CONDUIT OR TTOOL NAME/TITLE PRINCIPAL EXECUTIVE OFFICER EMPERATURES WATER Walter D. Langhans, Plt. HERCULES INCORPORATED HATTIESBURG CHARLES JORDAN PARAMETER TYPED OR PRINTED GROSS GROSS VALUE 0 0 ANTHE STREET MEASUREMENT REQUIREMENT REQUIREMENT REQUIREMENT MEASUREMENT MEASUREMENT MEASUREMENT MEASUREMENT MEASUREMENT REQUIREMENT REQUIREMENT REQUIREMENT RECUIRENENT SAMPLE SAMPLE SAMPLE SAMPLE PERMIT SAMPLE PERMIT SAMPLE SAMPLE PERMIT PERMIT PERMIT PERMIT PERMIT CERTIFY UNDER PENALTY OF LAW THAT HAVE PERSONALTY EXAMINED AND AM FAMILLAR WITH THE INFORMATION SUBMITTED HEREIN; AND BASED ON MY INQUIRY OF THOSE INDIVIDUALS IMMEDIATELY RESPONSIBLE FOR OBTAINING THE INFORMATION, I BELIEVE THE SUBMITTED INFORMATION IS TRUE. ACCURATE AND COMPRETE. AM AWARE THAT THERE ARE SIGNIFICANT PENALTIES FOR SUBMITTING FALSE INFORMATION, INCLUDING THE POSSIBILITY OF FINE AND IMPRISONMENT. SEE 18 U.S.C. \$ 1001 AND 33 U.S.C. \$ 1319. [Prantices under these stating may include fines up to \$10,000 and or maximum imprisonment of between 6 months and 6 years.] SE MS 39403-1937 (3 Card Only) (46-53) SAV DA REPORT 骨骨外骨骨骨 **计算计算的** AVERAGE 我非特特特女 *** 1.06 QUANTITY OR LOADING TON ANTINO *** MAXIMUM REPORT 日本本本を持 FROM 特殊特特特特 **今华华华华** NATIONAL POLLUTANT DISCHARGE ELIMINATION SYSTEM (NPDES)
DISCHARGE MONITORING REPORT (DMR)
(2-16) MS0001830 YEAR MO 97 12 (20-21) (22-23) (24-25) PERMIT NUMBER をかか MGD 存存存存 の物件的 SLINA 03) **MONITORING PERIOD** TO (4 Card Only) QUANTITY OR CONCENTRATION (46-63) 5 7.3 MINIMUM *** *** YEAR MO (26-27) (28-29) (30-31) DISCHARGE NUMBER OFFICER OR AUTHORIZED AGENT 002 A **林安安安安 AVERAGE** DAY 31 *** **特殊教育教徒** *** STORN HATER, NONC BNB NG \$040 B0941 N Approved 25 125 05-31-98 *** NO DISCHARGE [__ MAJOR I - INITIAL (SUBR SO) NOTE: Read instructions before completing this form. 9-0 105 DAILY MX MAXIMUM MAXIMUM **非常非常非常** 77 *** 154-611 **601 584-3220** *** US TELEPHONE DEG.E STINU NUMBER 151 121 Form Approved (62-63) NO. EX 0 0 0 FREQUENCY SAMPLE DNIINCOROR MITING ANALYSIS Small YEAR MEEK SAVO 98 (64-68) As noted As noted As noted DATE N_O GRAB GRAB (69-70) DAY 19

FACILITY HERCULES INCORPORATED ADDRESS P 0 80X 1937 LOCATION HATTIESBURG 00680 (TOC) CARBON COMMENTS AND EXPLANATION OF ANY VIOLATIONS (Reference all attachments here) EFFLUENT GROSS NAME/TITLE PRINCIPAL EXECUTIVE OFFICER Walter D. Langhans, HATTIESBURG 613 HEST TTH STREET CHARLES JORDAN PARAMETER TYPED OR PRINTED TOT ORSANIC VAL UE Plt. MEASUREMENT MEASUREMENT MEASUREMENT REQUIREMENT MEASUREMENT REQUIREMENT REQUIREMENT REQUIREMENT REQUIREMENT MEASUREMENT MEASUREMENT REQUIREMENT MEASUREMENT REQUIREMENT PERMIT SAMPLE SAMPLE SAMPLE SAMPLE SAMPLE SAMPLE PERMIT PERMIT SAMPLE PERMIT PERMIT PERMIT PERMIT I CERTIFY UNDER PENALTY OF LAW THAT! HAVE PERSONALTY EXAMINED AND AM FAMILIAR WITH THE INFORMATION SUBMITTED HERIN; AND BASED ON MY INQUIRY OF THOSE INFORMATION. I BELIEVE THE SUBMITTED INFORMATION IS BELIEVE THE SUBMITTED INFORMATION IS TRUE, ACCURATE AND COMPLETE. I AM AWARE THAT THERE ARE SIGNIFICANT PENALTIES FOR SUBMITTING FALSE INFORMATION, INCLUDING THE POSSIBILITY OF FINE AND IMPRISONMENT. SEE 18 U.S.C. \$ 1001 AND 33 U.S.C. \$ 1319. If provides under these affects any include fines up to \$10,000 and or maximum imperiorment of between 6 months and 6 years.) 返い N. S. (3 Card Only) (46-53) 2016 ORTO AVE 39403-1937 **AVERAGE** 939 QUANTITY OR LOADING 2019 GRIH HAX LBS/DV MAXIMUM FROM 1555 PERMIT NUMBER YEAR MO DAY (20-21) (22-23) (24-25) 97 10 SLING 261 **MONITORING PERIOD** 01 (4 Card Only) QUANTITY OR CONCENTRATION (54-45) TO MINIMUM *** YEAR MO (26-27) (28-29) (30-31) 97 DISCHARGE NUMBER OFFICER OR AUTHORIZED AGENT 12 **AVERAGE** DAY *** *** NOTE: Read instructions before completing this form. PROCESS HASTENATE Approval expires 05-31 98 (SUBR SO) MAJOR I - INITIAL MAXIMUM *** AREA NUMBER *** TELEPHONE # 12 SLINA (62-63) 띴 NO. FREQUENCY SAMPLE 0 SISATWN HONT 98 YEAR (64-68) As noted DATE No . OMP2 (69-70) TYPE DAY 19

PERMITTEE NAME/ADDRESS (Include Facility Name/Location if Different)

NATIONAL POLLUTANT DISCHARGE ELIMINATION SYSTEM (INFLES)
DISCHARGE MONITORING REPORT (DMR)
[2-16]

rorm Approved.

HERCULES INCORPORATED

EPA Form 3320-1 (08-95) Previous editions may be used.

(REPLACES EPA FORM T-40 WHICH MAY NOT BE USED.)

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FACILITY MERCULES INCORPORATED ADDRESS P O BOX 1937 LOCATION HATTIES BURG **ERIODAPHNIA** EFFLUENT LC50 STAT 48HR ACU EFFLUENT GROSS TAA3B 1 COMMENTS AND EXPLANATION OF ANY VIOLATIONS (Reference all attachments here) TAB6C NAME/TITLE PRINCIPAL EXECUTIVE OFFICER Walter D STAT 96HR ACU P PHALES HERCULES INCORPORATED 613 HEST TTH STREET HATTIESBURG CHARLES JORDAN PARAMETER D. Langhans, Plt. TYPED OR PRINTED SROSS 0 O ANT RE THAT MEASUREMENT REQUIREMENT REQUIREMENT MEASUREMENT MEASUREMENT MEASUREMENT MEASUREMENT REQUIREMENT MEASUREMENT MEASUREMENT REQUIREMENT REQUIREMENT REGUREMENT REQUIREMENT SAMPLE SAMPLE SAMPLE SAMPLE PERMIT SAMPLE SAMPLE PERMIT PERMIT PERMIT SAMPLE PERMIT PERMIT PERMIT CERTIFY UNDER PENALTY OF LAW THAT HAVE PERSONALLY EXAMINED AND AM FAMILIAR WITH THE INFORMATION SUBMITED HERRIN; AND BASED ON MY INQUIRY OF THOSE INDIVIDUALS IMMEDIATELY RESPONSIBLE FOR OBTAINING THE INFORMATION, I BELIEVE THE SUBMITTED INFORMATION IS TRUE, ACCURATE AND COMPLETE. AM AWARE THAT THERE ARE SIGNIFICANT PENALTIES FOR SUBMITTIND FALSE INFORMATION, INCLUDING SIGNIFICANT PENALTIES FOR SUBMITTIND FALSE INFORMATION, INCLUDING THE FOSSIBILITY OF FINE AND IMPRISONNED T. SEE 19 U.S.C. \$ 1319. [Praidles under Messe studies may include fines up to \$10,000 and or maximum imprisonment of between 6 months and 6 years.] SE (3 Card Only) QUANTITY OR LOADING (46-53) 39403-1937 **AVERAGE** *** *** FROM MAXIMUM *** *** NATIONAL POLLUTANT DISCHARGE ELMINATION SYSTEM (NPDES)
DISCHARGE MONITORING REPORT (DMR)
(17-19) PERMIT NUMBER (20-21) (22-23) (24-26) 97 YEAR MO DAY ** ** * ** **** 10 UNITS **MONITORING PERIOD** 01 (4 Card Only) QUANTITY OR CONCENTRATION (54-45) (46-53) ē 0 NEW CH MEN OR 5 MINIMUM 29.7 12.5 YEAR | MO (26-27) (28-29) (30-31) 97 DISCHARGE NUMBER OFFICER OF PRINCIPAL EXECUTIVE 12 **AVERAGE** **** DAY *** *** 31 NOTE: Read instructions before completing this form. MAJOR BIDASSAY REQUIREMAND No. 2040-0004 I - INITIAL (SUBR SO) **MAXIMUM** *** *** 601 584-3220 ER [23) ER (23) TELEPHONE CENT STIND NUMBER (62-63) E S 0 0 FREQUENCY SAMPLE ANALYSIS (64-68) TRLY As notted As noted YEAR 98 DATE MO 01 OWPZ OMPZ (69-70)TYPE DAY 19

PERMITTEE NAME/ADDRESS (Include Facility Name/Location if Different)

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EPA Form 3320-1 (08-95) Previous editions may be used.

(REPLACES EPA FORM T-40 WHICH MAY NOT BE USED.)

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LOCATION HATTIES BURG FACILITY HERCULES INCORPORATED ADDRESS P 0 BOX 1937 NAGE PERMITTEE NAME/ADDRESS (Include Facility Name/Location if Different) 00011 ATTMS CHARLES JOROAN DEG. FAHRENHEIT 50050 00400 EFFLUENT SROSS VALUE TEMPERATURE WATER EFFLUENT GROSS FLOW, IN CONDUIT OR EFFLUENT COMMENTS AND EXPLANATION OF ANY VIOLATIONS (Reference all attachments here) THRU TREATMENT PLANT MEASUREMENT Walter NAME/TITLE PRINCIPAL EXECUTIVE OFFICER HERCULES INCORPORATED HATTIESBURG 613 WEST 7TH PARAMETER TYPED OR PRINTED SROSS VALUE Langhans, Plt. BULLAN REQUIREMENT MEASUREMENT MEASUREMENT REQUIREMENT MEASUREMENT MEASUREMENT REQUIREMENT MEASUREMENT REQUIREMENT MEASUREMENT REQUIREMENT REQUIREMENT REQUIREMENT SAMPLE SAMPLE SAMPLE SAMPLE PERMIT SAMPLE PERMIT PERMIT SAMPLE SAMPLE PERMIT PERMIT PERMIT I CERTIFY UNDER PENALTY OF LAW THAT HAVE PERSONALLY EXAMINED AND AM FAMILLAR WITH THE INFORMATION SUBMITTED HERBY AND BASED ON MY INQUIRY OF THOSE INFORMATION IS MIMEDIATELY RESPONSIBLE FOR OBTAINING THE INFORMATION, I BELIEVE THE SUBMITTED INFORMATION IS TRUE. ACCURATE AND COMPLETE.

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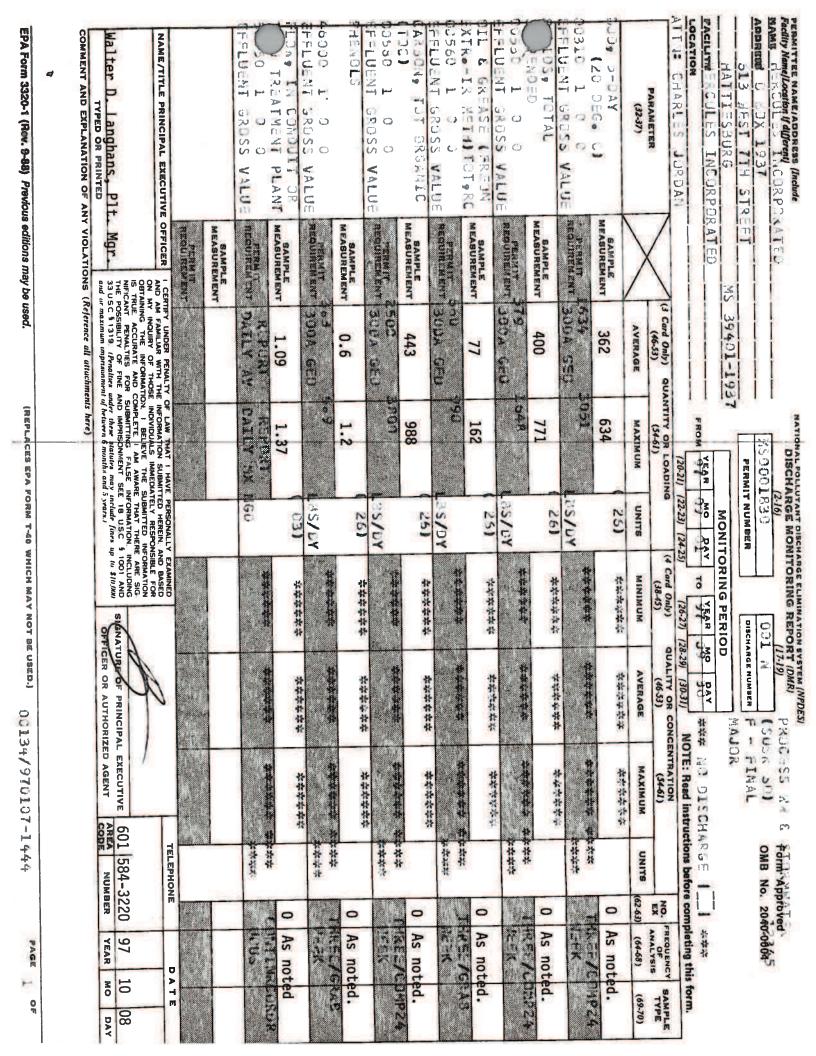
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EPA Form 3320-1 (08-95) Previous editions may be used.

(REPLACES EPA FORM T-40 WHICH MAY NOT BE USED.)

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[REPLACES EPA FORM T-40 WHICH MAY NOT BE USED.]

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EPA Form 3320-1 (Rev. 3-88) Previous editions may be used.

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EPA Form 3320-1 (Rev. 9-88) Previous editions may be used.

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PAGE OF



August 24, 1998

Hercules Incorporated 613 West 7th Street P.O. Box 1937 Hattiesburg, MS 39403-1937 (601) 545-3450 Fax: (601) 584-3226

KING Y

<u>Certified Mail - Return Receipt Requested</u> <u>Cert. # P 443-543-656</u>

Mohammad Yassin Office of Pollution Control P. O. Box 10385 Jackson, Ms. 39289-0385

Dear Mr. Yassin:



The purpose to this letter is to follow up our previous voice mail. On Monday, 08/17/98, our effluent discharge of 1,651 lbs/day exceeded our NPDES permit limit (1,557 lbs/day) for TSS. Analysis before and after this sample were 598 lbs/day and 586 lbs/day, respectively.

Investigations have not indicated any direct cause of this excursion, other than the possibility of sample mixup. If I can answer any additional questions, please let me know.

Sincerely,

HERCULES INCORPORATED

Charles S. Jordan

Environmental Coordinator

cc:

Walt Langhans
Plant Manager



Hercules Incorporated 613 West 7th Street P.O. Box 1937 Hattiesburg, MS 39403-1937 (601) 545-3450 Fax: (601) 584-3226

August 18, 1998

CERTIFIED MAIL - RETURN RECEIPT REQUESTED No. P-443-543-655

RECEIVED
AUG 2 1 1998

Mr. Mohammad Yassin Office of Pollution Control P. O. Box 10385 Jackson, MS 39289-0385

Dear Mr. Yassin:

Attached is our EPA Discharge Monitoring Report for the July, 1998.

Very truly yours,

HERCULES INCORPORATED

Charles S. Jordan

Charles

Environmental Coordinator

CSJ/vrf

Attached:

To: Earl Mahhafey

From: Mohammad Yassin Date: December 17, 1998

Subject: Hercules' Acute Toxicity Test

On November 5, 1998, we received a letter for USEPA, Region IV, concerning Acute Toxicity Tests collected at Hercules in June of this year. In the letter it was mentioned that the sample taken at Hercules fail the test. We had received the referenced analysis about a month ago and I wrote an NOV letter to the facility. The following was indicated in the letter; the facility collected their own samples on June 27, 1998, and the sample passed the Acute Toxicity Test. I sent a copy of Hercules test to Doug Upton for him to look at and tell us whether the sample was collected and analyzed properly. The facility is required to test within two weeks of test failure (permit condition), and they have done this. Please let me know if you have any questions.



Hercules Incorporated 613 West 7th Street * P.O. Box 1937 Hattiesburg, MS 39403-1937 (601) 545-3450 FAX: (601) 584-3226 http://www.herc.com

December 16, 1998

CERTIFIED MAIL - RETURN RECEIPT REQUESTED No. P-443-543-571



Mr. Mohammad Yassin Office of Pollution Control P. O. Box 10385 Jackson, MS 39289-0385

Dear Mr. Yassin:

Attached is our EPA Discharge Monitoring Report for the November, 1998.

Very truly yours,

HERCULES INCORPORATED

Charles S. Jordan

Environmental Coordinator

CSJ/vrf

Attached:



MISSISSIPPI DEPARTMENT OF ENVIRONMENTAL QUALITY

James I. Palmer, Jr., Executive Director

December 4, 1998

Charlie Jordan 613 West 7th Street P. O. Box 1937 Hattiesburg, MS 39403-1937

Re: Hercules

MS0001830,

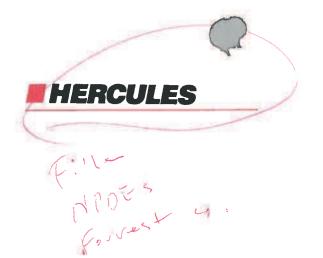
Dear Mr. Jordan;

Enclosed is a copy of the Compliance Monitoring Inspection (CMI) Report and sampling that was performed at Hercules on October 27, 1998. The results of this inspection should be used as a guide for complying with requirements and limitation as stated in your NPDES permit. The results indicate that the effluent was in compliance with the permit.

If you have any questions please call me at (601) 961-5195.

Sincerely,

Mohammad Yassin, PE



Hercules Incorporated 613 West 7th Street P.O. Box 1937 Hattiesburg, MS 39403-1937 (601) 545-3450 FAX: (601) 584-3226 http://www.herc.com

November 6, 1998

CERTIFIED MAIL - RETURN RECEIPT REQUESTED No. Z-079-760-447



Mr. Mohammad Yassin Office of Pollution Control P. O. Box 10385 Jackson, MS 39289-0385

Dear Mr. Yassin:

Attached is our EPA Discharge Monitoring Report for the October, 1998.

Very truly yours,

HERCULES INCORPORAȚED

Charles S. Jordan

(huster

Environmental Coordinator

CSJ/vrf

Attached:





REGION 4
ATLANTA FEDERAL CENTER
61 FORSYTH STREET
ATLANTA, GEORGIA 30303-8960

OCT 2 9 1998

Mr. Don Watts, Chief Environmental Compliance and Enforcement Division Mississippi Department of Environmental Quality P. O. Box 10385 Jackson, MS 39289-5171

RE: Acute Toxicity Tests Conducted by EPA Region 4

Dear Mr. Watts:

USEPA Region 4 conducted acute toxicity tests on final effluent from the subjected facilities listed below. Acute toxicity tests were conducted on a composite samples of effluent collected by Mississippi Department of Environmental Quality personnel and shipped to the USEPA Athens, Georgia laboratory. Enclosed are toxicity test results for the following facilities:

- 1) Hercules, Inc. MS0001830
- 2) Burlington Ind., Inc. MS0001848
- 3) Dupont MS0027294
- 4) Ash Corporation MS0002020
- 5) Jackson County MS0002674
- 6) Masonite Corp. MS0003042

Please note that Hercules, Inc. and Burlington Ind., Inc. failed toxicity tests. If you have any questions call me at 404-562-9757.

Sincerely,

Parvez A. Mallick

Environmental Engineer

Parvez A. Mallick

Clean Water Act Enforcement Section

Enclosure



File 187 Lo

October 14, 1998

Hercules Incorporated 613 West 7th Street P.O. Box 1937 Hattiesburg, MS 39403-1937 (601) 545-3450 FAX: (601) 584-3226 http://www.herc.com



Certified Mail - Return Receipt Requested Cert. # P 443-543-566

Mohammad Yassin Office of Pollution Control P. O. Box 10385 Jackson, Ms. 39289-0385

Dear Mr. Yassin:

Please find our response to your October 7, 1998, letter addressing the acute toxicity test on our June 2, 1998, effluent.

Our NPDES compliance monitoring results, on a June 2, 1998, 24hr. composite sample and a June 3, 1998, composite sample were as follows:

		COMPOSITE	COMPOSITE	GRAB
PARAMETER	(PERMIT LIMIT)	JUNE 2, 1998	JUNE 3, 1998	JUNE 3, 1998
BOD	2,322 lbs/day	96 lbs/day	255 lbs/day	
TSS	1,557 lbs/day	214 lbs/day	125 lbs/day	
O & G	990 lbs/day	26 lbs/day	18 lbs/day	32 lbs/day
PHENOL	6.6 lbs/day	1.3 lbs/day	ND lbs/day	0.1 lbs/day
FLOW	Report	0.64 mgd	0.60 mgd	

On June 2, 1998, representatives from MDEQ arrived at our facility at 12:45p.m. and I met them in our reception room. When MDEQ informed me they were here to set out sampling equipment to sample our effluent, I formally requested a split sample if the results were to be used for compliance monitoring purposes. Those present when I requested a split sample were Mr. Errol White (MDEQ), Mr Chad Seymor (MDEQ), myself, and Mr. Bud Sumrall (HERCULES). There was some discussion about the amount of sample and if there would be enough. At that point I again formally requested a split sample if this were for compliance monitoring.

Mohammad Yassin October 14, 1998 Page 2

On June 3, 1998, when the composite sample was picked up, we were not given enough sample to run bioassay testing. Therefore, we have no bioassay data from split sampling.

I have provided the data above to show that during this time period our effluent shows no abnormal characteristics. As well, we have reviewed our operational activities surrounding and during this time period and have found no indications of abnormal operations which might have resulted in the alleged toxicity.

Furthermore, we have since conducted our second quarter bioassay compliance monitoring on June 25, 1998, and the results of this testing were LC(50) > 100%.

If I can answer any additional questions please call me at (601) 545-3450 ext 360.

Sincerely,

HERCULES INCORPORATED

Charles S. Jordan

Environmental Coordinator

Charles before

cc: Walt Langhans

Plant Manager



Mahamora

Hercules Incorporated 613 West 7th Street P.O. Box 1937 Hattiesburg, MS 39403-1937 (601) 545-3450 FAX: (601) 584-3226 http://www.herc.com

October 19, 1998

CERTIFIED MAIL - RETURN RECEIPT REQUESTED No. Z-079-760-446



Mr. Mohammad Yassin Office of Pollution Control P. O. Box 10385 Jackson, MS 39289-0385

Dear Mr. Yassin:

Attached is our EPA Discharge Monitoring Report for the September, 1998, and our third quarter Bioassay results.

Very truly yours,

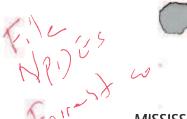
HERCULES INCORPORATED

Charles S. Jordan

Environmental Coordinator

CSJ/vrf

Attached:





MISSISSIPPI DEPARTMENT OF ENVIRONMENTAL QUALITY

James I. Palmer, Jr., Executive Director

October 7, 1998

Charlie Jordan 613 West 7th Street P. O. Box 1937 Hattiesburg, MS 39403-1937

Dear Mr. Jordan;

Re: Acute Toxicity Test Hercules

Enclosed please find a copy of the Bioassay Report for samples taken at Hercules Inc. on June 4, 1998. This report indicates that Hercules is not in compliance with its permit conditions. Please inform our office in writing by October 20, 1998, of the cause of this violation.

Sincerely,

Mohammad Yassin, PE, CHMM



September 30, 1998

Hercules Incorporated 613 West 7th Street P.O. Box 1937 Hattiesburg, MS 39403-1937 (601) 545-3450 FAX: (601) 584-3226 http://www.herc.com

RECEIVED

Certified Mail - Return Receipt Requested
Cert. # P 443-543-658

Mohammad Yassin Office of Pollution Control P. O. Box 10385 Jackson, Ms. 39289-0385

Dear Mr. Yassin:

The purpose of this letter is to document our September 30, 1998, phone conversation. As a result of hurricane Georges, our plant operations were shutdown prior to the arrival of Georges. During this event we experienced a loss of power in certain areas as a result of the hurricane. During this loss of power we experienced lift station(s) overflow which contained only rainfall, since our entire operations had taken a prior shutdown. We also checked the wastewater treatment bypass valves to see that they were operational, but did not have to open the bypass during this event.

If I can answer any additional questions please call me at 601-545-3450, ext 360.

Sincerely,

HERCULES INCORPORATED

Charles S. Jordan

Environmental Coordinator

cc:

Walt Langhans Plant Manager





MISSISSIPPI DEPARTMENT OF ENVIRONMENTAL QUALITY

James Palmer, Jr., Executive Director

September 29, 1998

Charlie Jordan 613 West 7th Street P. O. Box 1937 Hattiesburg, MS 39403-1937

Re: Hercules Inc.
Air CEI Report

Dear Mr. Jordan:

Enclosed please find our inspection report that was completed as a result of a Compliance Evaluation Inspection (CEI) at Hercules Inc. on September 14, 1998. This inspection revealed that the facility is in compliance with the Air Pollution Control permit conditions.

If you have any questions do not hesitate to contact me at (601) 961-5195.

Sincerely,

Mohammad Yassin, PE

Environmental Compliance and Enforcement Division

EMISSION POINTS & POLLUTION CONTROL DEVICES

	A TORNING STATE STATE CONTROL OF THE STATE O
	Equipment from each process area includes reactors, tanks, vents, piping, etc. Emissions from the process areas occur from their associated equipment and from fugitive losses.
	5)
AA-000	The Kymene process area produces specialty chemicals used primarily as wet strength additiving the manufacturing of paper.
AA-001	The Kymene process vent equipped with a packed bed water scrubber.
AA-002	The Kymene adipic acid handling system equipped with a dust shaker.
AA-003 and AA-004	Two (2) Kymene process storage tanks (Ref. no. K-411 and K-412), which are subject to NSI Subpart Kb.
AB-000	The Paracol process area produces specialty chemicals used primarily as sizing agents in the manufacturing of paper.
AB-001	The Paracol process vent equipped with a water scrubber.
AC-000	The Poly-Pale process area produces polymerized resin used primarily in adhesives and other resin derivatives.
AC-001	3.2 MMBTU/hr natural gas-fired Dowtherm Boiler.
AC-002	The Poly-Pale process vent equipped with a water scrubber (No.1).
AC-003	The Poly-Pale process vent equipped with a water scrubber (No.2).
AC-004	The Poly-Pale process melter.
AC-005	A Poly-Pale process storage tank (Ref. no. T-80), which is subject to NSPS, Subpart Kb.
AD-000	The Neuphor process area produces specialty chemicals used primarily as sizing agents in the manufacturing of paper.
AD-001	The Adduct Reactor process vent equipped with a carbon adsorption scrubber.
AD-002	The Dresinol process vent equipped with a water eductor.
AD-003	A process storage tank (NT-180) equipped with a water scrubber.
AE-000	The Metal Resinates process area produces specialty chemicals used in manufacturing public gravure printing inks.
AE-001	The Metal Resinates process vent equipped with a total condenser.
AE-002, AE-003, and AE-004	Three (3) process storage tanks (Ref. no. S-125, S-126, S-127), which are subject to NSPS, Subpart Kb.
AF-000	The Rosin Amine Derivatives (RAD) process area produces chemicals used primarily as a
	AA-001 AA-002 AA-003 and AA-004 AB-000 AB-001 AC-000 AC-001 AC-002 AC-003 AC-004 AC-005 AD-000 AD-001 AD-001 AD-002 AD-003 AE-000 AE-001 AE-000 AE-001

Morning Ja

Not in operation

out of service

	Emission Point	Description
	AF-001	
,		8.3 MMBTU/hr natural gas-fired Dowtherm Boiler.
	AF-002	The RAD process Ammoniation Vent.
6mm.n	AF-003	The RAD process Amine Vent.
Jent System	→ AF-004	The RAD process vent equipped with a packed bed scrubber.
	AG-000	The Hard Resins process area (HRA) produces chemicals used primarily in chewing gum and adhesives. The equipment can also be used to produce sizing agents used primarily in the manufacturing of paper.
	/ AG-001	8.3 MMBTU/hr natural gas-fired Dowtherm Boiler.
not in	→ AG-002	3.3 MMBTU/hr natural gas-fired Dowtherm Boiler.
	AG-003	The HRA process kettle vent equipped with a water scrubber.
ni ton	→ AG-004	The HRA process Continuous Esterification Vent.
`	AG-005	The HRA process Flaking Belt Dust Collector.
	AH-000	The Rosin Shed process area produces drummed rosin for various end uses.
	AI-000	The Staybelite process area produces resin derivatives.
not in over ton	→ AI-001	The Staybelite process hydrogenation separator vent.
	AJ-000	The Rosin Distillation process area produces distilled rosin.
	AJ-001	3.3 MMBTU/hr natural gas-fired Dowtherm Boiler.
not in	AK-000	The Hydrogen Generation process area produces hydrogen and consists of: 1) natural gas catalytic cracking; 2) catalytic carbon monoxide conversion; 3) carbon dioxide, water, and caustic scrubbing; and 4) methane.
	AK-001	21.0 MMBTU/hr natural gas-fired Hydrogen Furnace, which was installed prior to 1989.
	AL-000	The Defoamer process area produces specialty chemicals used primarily in the manufacturing of paper.
	AL-001	0.2 MMBTU/hr natural gas-fired Silica Furnace.
	, AL-002	The Defoamer process silica furnace dust collector.
O 58	AM-001	The 156.0 MMBTU/hr package boiler No. 5, which was installed prior to 1977 with the capability to burn natural gas, fuel oil #2, and fuel oil #6.
	AM-002	The 65.0 MMBTU/hr package boiler No. 6, which was installed prior to 1989 with the capability to burn natural gas, fuel oil #2, and fuel oil #6.
	AN-000	The Effluent Treatment process area consists of equalization, solids removal, pH adjustment, dissolved air floatation, neutralization, and activated carbon adsorption.
	AN-001	The 2.95 MMBTU/hr natural gas-fired Carbon Regeneration Furnace equipped with a water scrubber.

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MISSISSIPPI DEPARTMENT OF ENVIRONMENTAL QUALITY

James I. Palmer, Jr., Executive Director

September 29, 1998

Charlie Jordan 613 West 7th Street P. O. Box 1937 Hattiesburg, MS 39403-1937

> Re: Hercules Inc. CEI

Dear Mr. Jordan:

Enclosed please find our inspection report that was completed as a result of a Compliance Evaluation Inspection (CEI) at Hercules Inc. on September 14, 1998. This inspection revealed that the facility is in compliance with the NPDES permit conditions.

If you have any questions do not hesitate to contact me at (601) 961-5195.

Sincerely,

Mohammad Yassin, PE

Environmental Compliance and Enforcement Division



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 4

Science and Ecosystem Support Division 980 College Station Road Athens, Georgia 30605-2720

24 SEP 1998



Steve Spengler
Chief, Industrial NPDES Permit Section
MS Department of Environmental Quality
Office of Pollution Control
Environmental Permits Division
P.O. Box 10385
Jackson, Mississippi 39289-0385

SUBJ: Acute Toxicity Test Results for Hercules, Inc. (NPDES #MS0001830)

Dear Steve:

At the request of the USEPA Water Management Division, acute toxicity tests were conducted on final effluent from Hercules, Inc., Hattiesburg, Mississippi. Tests were conducted on a composite sample of effluent from outfall 002 collected June 2-3, 1998 by Mississippi Department of Environmental Quality personnel and shipped to the USEPA Athens, Georgia laboratory. Acute toxicity tests were conducted June 4-6, 1998 on daphnids (Ceriodaphnia dubia) and June 4-8, 1998 on fathead minnows (Pimephales promelas) following procedures outlined in the USEPA manual "Methods for Measuring the Acute Toxicity of Effluents and Receiving Waters to Freshwater and Marine Organisms" EPA/600/4-90/027F.

Toxicity tests were conducted according to instructions in the facility's NPDES permit. Definitive acute toxicity tests were conducted on a control, 100% effluent and a series of concentrations using a dilution factor of 0.5 from the 100% effluent. Control water used for both tests was a diluted mineral water. The 96-hour acute test was renewed at 48 hours with a portion of the original sample. The 48-hour daphnid acute test was not renewed.

Significant mortality occurred in both the daphnid and minnow tests. The statistical method used in analyzing the

survival data and determining the LC_{50} was the Trimmed Spearman-Karber Method. A 48-hour LC_{50} of 9.1% for the daphnids and a 96-hour LC_{50} of 8.8% for the minnows was determined. The permit requirement is an LC_{50} greater than or equal to 10.7% of the effluent to pass. Both test results constituted a failure of the permit requirements.

A summary of test conditions, test results, and pertinent physical-chemical water quality data are included in the attached Tables 1-2.

If you have any questions, please call me at 706/355-8707.

Sincerely,

Kay Millar

Ecological Assessment Branch

cc: Loyd Sharp, MSDEQ

Table 1. Data Recorded During a 48-Hour, Daphnid Acute Static Toxicity Test Conducted on Effluent (Outfall 002) Collected 6/2-3/98 at Hercules, Inc., Hattiesburg, Mississippi, June 4-6, 1998.

							<u></u>
Conc Effluent	(%)	0	6.25	12.5	25	50	100
Ę	0	20	20	20	20	20	20
Number of Live Organisms	24	20	20	20	0	٥	°
of sms	48	20	19	2	0	0	0
Di	0	8.4	9.1	8.6	7.8	7.5	7.1
Dissolved Oxygen (mg/L)	24	1	'	1	7.3	7.3	7.3
ygen	48	7.9	7.6	7.6	1	-	1
	0	25.0	25.0	25.0	25.0	25.0	25.0
Temperature (°C)	24	25.0	25.0	25.0	25.0	25.0	25.0
ä	48	24.8	24.8	24.8	1	1	-
	pH (SU)	8.3	8.1	8.0	8.0	8.0	8.0
	Total Alk (mg/L)	81	1	1	1	-	127
Initial	Hardness (mg/L)	92	ı	1	:	ı	44
ial Water Quality	Conductivity (µmhos/cm)	194	342	482	760	1300	2360
	Salinity (ppt)	0.0	0.1	0.2	0.3	0.7	1.3
-	TRC (mg/L)	0.01	1	1	1	1	0.01

.

Table 2. Data Recorded During a 96-Hour, Fathead Minnow Acute Static Renewal Toxicity Test Conducted on Effluent (Outfall 002) Collected 6/2-3/98 at Hercules, Inc., Hattiesburg, Mississippi, June 4-8, 1998.

Conc. Effluent		Liv	Number of Live Organisms	of nisms			Diss	Dissolved Oxygen (mg/L)	xygen (L)			Te	Temperature (°C)	are				Initial	Initial Water Quality		
(%)	0	24	48	72	96	0	24	48	72	96	0	24	48	72	96	pH (SU)	Total Alk. (mg/L)	Hardness (mg/L)	Conductivity (µmhos/cm)	Salinity (ppt)	TRC (mg/L)
0	20	20	20	20	20	8.4	8.3	8.7	8.4	8.1	25	24	24	24	24	8.3	81	92	194	0.0	
6.25	20	18	17	16	16	9.1	8.1	8.5	7.9	8.0	25	24	24	24	24	% .1	ı	1	342	0.1	
12.5	20	16	9	00	4	8.6	7.9	8.1	6.0	7.8	25	24	24	24	24	8.0	1	ı	482	0.2	
25	20	0	0	0	0	7.8	5.3	1	1	ı	25	24	1	1	1	8.0	1	1	760	0.3	
50	20	0	0	0	0	7.5	4.1	1	ı	1	25	24	ı	ı	ı	8.0	ı	-	1300	0.7	
100	20	0	0	0	0	7.1	4.1	-	ı	T	25	24	ı	1	1	8.0	127	44	2360	1.3	

¹ concentrations were renewed at 48 hours with original sample of effluent



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 4

Science and Ecosystem Support Division 980 College Station Road Athens, Georgia 30605-2720

2 4 SEP 1998

MEMORANDUM

SUBJECT: Hercules, Inc., Hattiesburg, Mississippi

Acute Toxicity Test Results,

June 4-8, 1998, NPDES #MS0001830

FROM: Kay Millar KM

Science and Ecosystem Support Division

Ecological Assessment Branch

TO: Parvez Mallick

Mississippi State Coordinator

Water Management Division

Water Programs Enforcement Branch Clean Water Act Enforcement Section

As requested by the Water Management Division, personnel from the SESD Ecological Assessment Branch conducted acute toxicity tests on final effluent from the subject facility. Tests were conducted on a composite sample of effluent from outfall 002 collected June 2-3, 1998 by Mississippi Department of Environmental Quality personnel and shipped to the USEPA Athens, Georgia laboratory. Acute toxicity tests were conducted June 4-6, 1998 on daphnids (Ceriodaphnia dubia) and June 4-8, 1998 on fathead minnows (Pimephales promelas) following procedures outlined in the USEPA manual "Methods for Measuring the Acute Toxicity of Effluents and Receiving Waters to Freshwater and Marine Organisms" EPA/600/4-90/027F.

Toxicity tests were conducted according to instructions in the facility's NPDES permit. Definitive acute toxicity tests were conducted on a control, 100% effluent and a series of

Table 1. Data Recorded During a 48-Hour, Daphnid Acute Static Toxicity Test Conducted on Effluent (Outfall 002) Collected 6/2-3/98 at Hercules, Inc., Hattiesburg, Mississippi, June 4-6, 1998.

100	50	25	12.5	6.25	0	(%)	Conc Effluent
20	20	20	20	20	20	0	Į,
0	0	0	20	20	20	24	Number of Live Organisms
°	٥	0	2	19	20	48	sms
7.1	7.5	7.8	8.6	9.1	00.4	0	Di
7.3	7.3	7.3	'	1	1	24	Dissolved Oxygen (mg/L)
	'	'	7.6	7.6	7.9	48	ygen
25.0	25.0	25.0	25.0	25.0	25.0	0	
25.0	25.0	25.0	25.0	25.0	25.0	24	Temperature (*C)
-	ı	'	24.8	24.8	24.8	48	ā
8.0	8.0	8.0	8.0	8.1	8.3	pH (SU)	
127	t		ı	:	81	Total Alk (mg/L)	
44	:	ŧ	ŧ	1	92	Hardness (mg/L)	İniti
2360	1300	760	482	342	194	Conductivity (µmhos/cm)	Initial Water Quality
1.3	0.7	0.3	0.2	0.1	0.0	Salinity (ppt)	
0.01	_	1	-	-	0.01	TRC (mg/L)	



Hercules Incorporated 613 West 7th Street P.O. Box 1937 Hattiesburg, MS 39403-1937 (601) 545-3450 FAX: (601) 584-3226 http://www.herc.com

September 15, 1998

CERTIFIED MAIL - RETURN RECEIPT REQUESTED No. P-443-543-657

SEP | 8 1998

Mr. Mohammad Yassin Office of Pollution Control P. O. Box 10385 Jackson, MS 39289-0385

Dear Mr. Yassin:

Attached is our EPA Discharge Monitoring Report for the August, 1998.

Very truly yours,

HERCULES INCORPORATED

Charles S. Jordan

Environmental Coordinator

CSJ/vrf

Attached:





MISSISSIPPI DEPARTMENT OF ENVIRONMENTAL QUALITY

James I. Palmer, Jr., Executive Director

August 3, 1998

Charlie Jordan 613 West 7th Street P. O. Box 1937 Hattiesburg, MS 39403-1937

> Re: Hercules MS0001830

Dear Mr. Jordan;

Enclosed is a copy of the Compliance Monitoring Inspection (CMI) Report and sampling that was performed at Hercules on June 3, 1998. The results of this inspection should be used as a guide for complying with requirements and limitation as stated in your NPDES permit. The results indicate that the effluent was in compliance with the permit.

If you have any questions please call me at (601) 961-5195.

Sincerely,

Mohammad Yassin, PE





July 20, 1998

Hercules Incorporated 613 West 7th Street P.O. Box 1937 Hattiesburg, MS 39403-1937 (601) 545-3450 FAX: (601) 584-3226 http://www.herc.com

CERTIFIED MAIL - RETURN RECEIPT REQUESTED Cert. No. P 443-543-651

Jeffery T. Pallas, Chief
South Enforcement and Compliance Section
RCRA Enforcement and Compliance Branch
United States Environmental Protection Agency
Region 4
Atlanta Federal Center
61 Forsyth Street
Atlanta, Georgia 30303-8960

Dear Mr Pallas:

Regarding your July 14, 1998, letter, please find our attached June 22, 1998, response to the two alleged violations addressed in the State's June 16, 1998, letter.

As noted in our June 22, 1998, response, review of both of these items was completed in June, 1998. If I can answer any additional questions please call me at 601-545-3450 ext. 360.

Very truly yours,

HERCULES INCORPORATED

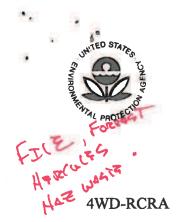
Charles S. Jordan

Environmental Coordinator

CSJ/

Attachment:

cc: Don Watts, MDEQ
Walter D. Langhans, Plant Manager, Hercules
Lloyd Madden, Hercules





REGION 4
ATLANTA FEDERAL CENTER
61 FORSYTH STREET
ATLANTA, GEORGIA 30303-8960

JUL 1 4 1998

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

JUL 2 0 1998

Mr. Lloyd D. Madden, Safety & Training Hercules Incorporated 613 West 7th Street Post Office Box 1937 Hattiesburg, Mississippi 39403-1937

SUBJ: Resource Conservation and Recovery Act (RCRA) Inspection of Hercules

Incorporated: MSD 008 182 081

Dear Mr. Madden:

Please find enclosed a copy of the RCRA Compliance and Evaluation Inspection report prepared by the U.S. Environmental Protection Agency (EPA) following an inspection performed on June 9, 1998, at Hercules Incorporated, by EPA and the Mississippi Department of Environmental Quality.

Two violations of federal environmental regulations were discovered during the time of inspection.

Should you have any questions, please contact Mr. Carlos E. Merizalde, of my staff, at (404) 562-8606.

Sincerely.

Jeffrey T. Pallas, Chief

South Enforcement and Compliance Section RCRA Enforcement and Compliance Branch

Enclosure

cc w/encl.: Don Watts, MDEQ





MISSISSIPPI DEPARTMENT OF ENVIRONMENTAL QUALITY

James I. Palmer, Jr., Executive Director

June 29, 1998

Charlie Jordan 613 West 7th Street P. O. Box 1937 Hattiesburg, MS 39403-1937

Dear Mr. Jordan;

Enclosed is a copy of the Compliance Monitoring Inspection Report and sampling that was performed at Hercules on January 28, 1998. The results of this inspection should be used as a guide for complying with requirements and limitation as stated in your NPDES permit. The results indicate that the effluent was in compliance with the permit.

If you have any questions please call me at (601) 961-5195.

Sincerely,

Mohammad Yassin, PE



June 18, 1998

CERTIFIED MAIL - RETURN RECEIPT REQUESTED No. P-443-543-562



Mr. Mohammad Yassin Office of Pollution Control P. O. Box 10385 Jackson, MS 39289-0385

Dear Mr. Yassin:

Attached is our EPA Discharge Monitoring Report for the May, 1998.

Very truly yours,

HERCULES INCORPORATED

Charles S. Jordan

Environmental Coordinator

CSJ/vrf

Attached:



June 22, 1998

CERTIFIED MAIL - RETURN RECEIPT REQUESTED No. P-443-543-563

Mr. Mohammad Yassin Office of Pollution Control P. O. Box 10385 Jackson, MS 39289-0385

Dear Mr. Yassin:

Please find our response to the two alleged violations in your 06/16/1998 letter.

"262.34(c)(1), and 265.173(a): Containers holding hazardous waste must be closed during storage except when waste is added or removed."

The drum in question is a 55-gallon open-head drum we use to drain the "last drop" of paint from paint cans that are "empty" by definition, and thus exempt from the regulations. Over the years we have collected a couple of drums of paint "remains" and, therefore, have kept this material out of landfills. We understand that we are going beyond what is required by the regulations, but we believe this practice is a worthy cause. Our practice is to dispose of this material by incineration as a hazardous waste rather than go into expensive analysis that are sometimes more costly than the actual disposal cost of one drum of waste. In order to address the alleged violation without stopping this worthwhile cause, we will instruct both the paint area supervision and workers to keep the drum lid on the open-head drum at all times, except when the drum is in use. This review will be completed by the end of June, 1998.

"262.34(a)(4), and 265.52(e); The contingency plan must include a list of all emergency equipment at the facility, the location and physical description of each item, and a brief outline of each item's capability. The list must be kept up to date.

Mr. Mohammad Yassin June 22, 1998 Page 2

Our plant's Emergency Response manual contains a list of emergency equipment. We will update the list to include the location, the physical description of each item, and a brief outline of each item's capability. This review will also be completed by the end of June, 1998.

If I can answer any additional questions please call me at 601 545-3450 ext 360.

Very truly yours,

HERCULES INCORPORATED

Charles S. Jordan

Environmental Coordinator

CSJ/vrf

cc: Walter D. Langhans, Plant Manager





June 18, 1998

Hercules Incorporated 613 West 7th Street P.O. Box 1937 Hattiesburg, MS 39403-1937 (601) 545-3450 FAX: (601) 584-3226 http://www.herc.com

<u>CERTIFIED MAIL - RETURN RECEIPT REQUESTED</u> No. P-443-543-650

Mr. Mohammad Yassin Office of Pollution Control P. O. Box 10385 Jackson, MS 39289-0385

Dear Mr. Yassin:

Attached is our EPA Bioassay Monitoring Report for the second quarter, 1998.

Very truly yours,

HERCULES INCORPORATED

Charles S. Jordan

Environmental Coordinator

CSJ/vrf

Attached:

FATHRAD MINNOW ACUTE BIOASSAY

CLIENT: HERCULES, INC. DATE STARTED: 06/27/98 TIME STARTED: 02:30 P.M. ANALYST: JDS

NUMBER DEAD								
REP #	A				Е	•		
HOURS	24	48	72	96	24	48	72	96
0%	0	0	0	0	0	0	0	0
6.25%	0	0	0	0	0	0	0	0
12.54	0	0	0	a	0	0	0	0
25%	0	0	0	0	0	0	0	0
50%	0	0	0	0	0	0	0	0
100%	0	0	0	0	0	0	0	0

LABORATORY NOTES:

Test Method: 96-hr acute definitive bioassay Species: Pimephales promelas (fathead minnow)

Age: <24hr-old
No. Replicates: 2
No. Organisms/Rep: 10

No. Dilutions: 5 + control Sample I.D.: Final Ditch Date Initiated: 06/27/98

TOTAL DEAD (FOR LC_{so} DETERMINATION):

0% - 0
6.25% - 0
12.5% - 0
25% - 0
50% - 0
100% - 0

LC₅₀ > 100% (NO STATISTICS REQUIRED)

RAW DATA CERTIFIED BY:

DATE:

4

Ceriodaphnia dubia ACUTE BIOASSAY

CLIENT: HERCULES, INC. DATE STARTED: 06/27/98 TIME STARTED: 04:30 P.M. ANALYST: JDS

NUMBER	DEAD

NOFIDER DELLE								
REP #	1		В		С		D	
Hours	24	48	24	48	24	48	24	48
0%	0	a	0	0	0	0	0	0
6.25%	0	0	0	0	0	0	0	0
12.5%	0	0	0	0	0	0	0	0
25%	0	0	0	0	0	0	0	0
501	0	0	0	0	0	0	0	0
1004	0	0	D	0	0	0	0	0

LABORATORY NOTES:

Test Method: 48-hr acute definitive bioassay

Species: Ceriodaphnia dubia (water flea)

Age: <24hr-old No. Replicates: No. Organisms/Rep: 5

No. Dilutions: 5 + control Sample I.D.: Final Ditch Date Initiated: 06/27/98

TOTAL DEAD (FOR LC₅₀ DETERMINATION):

0% -

6.25% -

12.5% -

25% -0

50% -0

100% -

 $LC_{50} > 100%$ (NO STATISTICS REQUIRED)

RAW DATA CERTIFIED BY:

Deluma DATE: 7/12/98



Hercules Incorporated 613 West 7th Street P.O. Box 1937 Hattiesburg, MS 39403-1937 (601) 545-3450 FAX: (601) 584-3226 http://www.herc.com

June 18, 1998



<u>CERTIFIED MAIL - RETURN RECEIPT REQUESTED</u>
No. P-443-543-649

Mr. Mohammad Yassin Office of Pollution Control P. O. Box 10385 Jackson, MS 39289-0385

Dear Mr. Yassin:

Attached is our EPA Discharge Monitoring Report for the June, 1998.

Very truly yours,

HERCULES INCORPORATED

Charles S. Jordan

Environmental Coordinator

CSJ/vrf

Attached:



May 8, 1998

CERTIFIED MAIL - RETURN RECEIPT REQUESTED No. P-443-543-640

RECEIVED

MAY 1 1998

Orice of Political Control

Mr. Mohammad Yassin Office of Pollution Control P. O. Box 10385 Jackson, MS 39289-0385

Dear Mr. Yassin:

Attached is our EPA Discharge Monitoring Report for the April, 1998.

Very truly yours,

HERCULES INCORPORATED

Charles S. Jordan

Environmental Coordinator

CSJ/vrf

Attached:



May 8, 1998

Hercules Incorporated 613 West 7th Street P.O. Box 1937 Hattiesburg, MS 39403-193 (601) 545-3450 Fax: (601) 584-3226

CERTIFIED MAIL - RETURN RECEIPT REQUESTED No. P-443-543-639

Mr. Mohammad Yassin Office of Pollution Control P. O. Box 10385 Jackson, MS 39289-0385

Dear Mr. Yassin:



In reference to our previous phone message, the purpose of this letter is to inform you that on April 28, 1998, we exceeded our NPDES permit limit for both phenols and BOD. During heavy rainfalls which resulted in above average discharge, we exceeded our permit limit as shown below. The previous day, April 27, 1998, both phenol and BOD analyses were in compliance as was the following day, April 29, 1998. Our average wastewater flow is 0.7 MGD. On April 28, 1998, our flow rate was 1.37 MGD.

DATE	PHENOL	(lbs/day)	BOD (lbs/day)		
	<u>Actual</u>	<u>Limit</u>	Actual	<u>Limit</u>	
4/28/98	10.3	6.6	4776	2322	

If I can answer any additional questions please call me at (601) 545-3450, ext. 360.

Very truly yours,

HERCULES INCORPORATED

Charles S. Jordan

Environmental Coordinator

CSJ/vrf

cc: Walter D. Langhans, Plant Manager



April 15, 1998

CERTIFIED MAIL - RETURN RECEIPT REQUESTED No. P-443-543-561



Mr. Mohammad Yassin Office of Pollution Control P. O. Box 10385 Jackson, MS 39289-0385

Dear Mr. Yassin:

Attached is our EPA Discharge Monitoring Report for the 1st Quarter of 1998.

Very truly yours,

HERCULES INCORPORATED

Charles S. Jordan

Environmental Coordinator

CSJ/vrf

Attached:

Ceriodaphnia dubia ACUTE BIOASSAY

CLIENT: HERCULES, INC. DATE STARTED: 03/13/98 TIME STARTED: 04:00 P.M. ANALYST: RMS

5

5

NU	MBER DEA	D				
F		C		D		
24	48	24	48	24	48	
0	0	0	0	o	0	
0	0	0	0	0	0	

5

5

5

3

5

5

1

4

5

5

5

5

5

LABORATORY NOTES:

REP #

HOURS

0 %

6.25%

12.5%

25%

50 t

100%

Test Method: 48-hr acute definitive bioassay

A

48

0

5

5

5

5

24

0

5

Species: Ceriodaphnia dubia (water flea)

5

Age: <24hr-old No. Replicates: No. Organisms/Rep:

No. Dilutions: 5 + control Sample I.D.: Final Ditch Date Initiated: 03/13/98

TOTAL DEAD (FOR LC₅₀ DETERMINATION):

0 - 806.258 - 012.5% - 8 25% - 20 50% - 20 100% - 20

 $LC_{50} = 13.40%$ (Trimmed Spearman-Karber Method)

RAW DATA CERTIFIED BY: Rib M. Melloud DATE: 4-8-98

FATHEAD MINNOW ACUTE BIOASSAY

CLIENT: HERCULES, INC. DATE STARTED: 03/13/98 TIME STARTED: 05:15 P.M. ANALYST: RMS

	N	UHB	ER.	Di	<u>ca</u> D
_					- 1

NUMBER DEAD								
REP #	A				В			
HOURS	24	48	72	96	24	48	72	96
0 %	0	0	0	0	0	0	0	0
6.25%	0	0	2	2	0	0	0	0
12.5%	2	2	3	3	0	0	1	1
25%	9	10	10	10	10	10	10	10
50%	10	10	10	10	10	10	10	10
100%	10	10	10	10	10	10	10	10

LABORATORY NOTES:

Test Method: 96-hr acute definitive bioassay Species: Pimephales promelas (fathead minnow)

Age: <24hr-old No. Replicates: No. Organisms/Rep: 10

No. Dilutions: 5 + control Sample I.D.: Final Ditch Date Initiated: 03/13/98

TOTAL DEAD (FOR LC 50 DETERMINATION):

08 -

6.25% -2

12.5% -25% - 20

50% - 20

100% - 20

LC₅₀ = 15.61% (Trimmed Spearman-Karber Method)

RAW DATA CERTIFIED BY:





MISSISSIPPI DEPARTMENT OF ENVIRONMENTAL QUALITY

James | Palmer, Jr., Executive Director

April 30, 1998

Charlie Jordan 613 West 7th Street P. O. Box 1937 Hattiesburg, MS 39403-1937

Dear Mr. Jordan;

Enclosed is a copy of the Compliance Monitoring Inspection Report and sampling that was performed at Hercules on January 28, 1998. The results of this inspection should be used as a guide for complying with requirements and limitation as stated in your NPDES permit. The results indicate that the effluent was in compliance with the permit.

If you have any questions please call me at (601) 961-5195.

Sincerely,

Mohammad Yassin, PE



April 15, 1998

CERTIFIED MAIL - RETURN RECEIPT REQUESTED No. P-443-543-636



Mr. Mohammad Yassin Office of Pollution Control P. O. Box 10385 Jackson, MS 39289-0385

Dear Mr. Yassin:

Attached is our EPA Discharge Monitoring Report for March, 1998.

Very truly yours,

HERCULES INCORPORATED

Charles S. Jordan

Charle

Environmental Coordinator

CSJ/vrf

Attached:



MISSISSIPPI DEPARTMENT OF ENVIRONMENTAL QUALITY

James I Palmer, Jr., Executive Director

FORREST

April 15, 1998

Charlie Jordan 613 West 7th Street P. O. Box 1937 Hattiesburg, MS 39403-1937

Re: Hercules Inc. CEI

Dear Mr. Jordan:

Enclosed please find our inspection report that was completed as a result of a Compliance Evaluation Inspection (CEI) at Hercules Inc. on April 13, 1998. This inspection revealed that the facility is in compliance with the NPDES permit conditions.

If you have any questions do not hesitate to contact me at (601) 961-5195.

Sincerely,

Mohammad Yassin, PE





Hercules II
613 West 7trated
P.O. Box 1931
Hattiesburg, M.
(601) 545-34503-1937
Fax: (601) 584-3

March 16, 1998

CERTIFIED MAIL - RETURN RECEIPT REQUESTED No. P-443-543-558

Mr. Charles Cook Office of Pollution Control P. O. Box 10385 Jackson, MS 39289-0385

Dear Mr. Cook:

Attached is our EPA Discharge Monitoring Report for February, 1998.

Very truly yours,

HERCULES INCORPORATED

Charles S. Jordan

Chan

Environmental Coordinator

CSJ/vrf

Attached:





March 10, 1998

<u>Certified Mail - Return Receipt Requested</u> <u>CM#: P 443-543-556</u>

Mr. Charles Cook
Bureau of Pollution Control
P. O. Box 10385
Jackson, Ms 39209-0385

Dear Mr. Cook:



The purpose of this letter is to follow up our previous phone call. On 03/07/98, at approximately 6:30 p.m. during a heavy rainfall, approximately 4.1 inches over a 3 to 4 hour time period, we experienced equipment failure with one of our two pumps at # 5 lift station. As a result of this equipment malfunction a portion of the lift station's increased hydraulic load (predominantly rainfall) overflowed into stormwater runoff for approximately two hours. The pump malfunction was the result of the motor shorting out. The motor is scheduled for replacement on 3/10/98.

Also, during this same rainfall event, we estimate the following amount of primary wastewater bypassing secondary treatment in order to prevent basin overflow.

 DATE
 FLOW
 TOC
 LBS/DAY
 PERMIT LIMIT

 3/7/98
 2,610 gpm x 55 min.
 18mg/l
 22
 3,019

If I can answer any additional questions, please call me at 601-545-3450 ext. 360.

Very truly yours,

HERCULES INCORPORATED

Charles S. Jordan

Environmental Coordinator

cc: Walter D. Langhans
Plant Manager



March 9, 1998

Hercules Incorporated 613 West 7th Street P.O. Box 1937 Hattiesburg, MS 39403-1937 (601) 545-3450 Fax: (601) 584-3226

Certified Mail - Return Receipt Requested CM# P-443-543-565

Mr. Charles Cook

Bureau of Pollution Control
P. O. Box 10385

Jackson, Ms 39289-0385

Dear Mr. Cook:

I of the way



RE: NPDES Permit No MS0001830

Please find the attachments addressing a storm water pollution study as required in other standard conditions. A total of twelve (12) sites have been identified to minimize the amount of storm water entering our industrial wastewater treatment system. We estimate the implementation of this study will remove approximately 5 acres of storm water. This removal, coupled with increased pump capacity of approximately 4,000 GPM, should minimize any bypassing potential as the result of heavy rainfall events.

If I can answer any additional questions please call me at 601-545-3450 ext 360.

Sincerely,

HERCULES INCORPORATED

Charles S. Jordan

Environmental Coordinator

CSJ/vrf

Attachments:

cc: Walt Langhans w/o attachments



3 file

Hercules Incorporated 613 West 7th Street P.O. Box 1937 Hattiesburg, MS 39403-1937 (601) 545-3450 Fax: (601) 584-3226

February 2, 1998

CERTIFIED MAIL - RETURN RECEIPT REQUESTED No. P-443-543-547

Mr. Charles Cook Office of Pollution Control P. O. Box 10385 Jackson, MS 39289-0385

Dear Mr. Cook:

Attached is our EPA Discharge Monitoring Report for January, 1998.

Very truly yours,

HERCULES INCORPORATED

Charles S. Jordan

Environmental Coordinator

CSJ/vrf



January 19, 1998

<u>CERTIFIED MAIL - RETURN RECEIPT REQUESTED</u> No. P-443-543-545

Ms. Becky Williams
Office of Pollution Control
P. O. Box 10385
Jackson, MS 39289-0385

Dear Ms. Williams:

Attached is our EPA Discharge Monitoring Report for December, 1997.

Very truly yours,

HERCULES INCORPORATED

Charles S. Jordan

Environmental Coordinator

CSJ/vrf



January 19, 1998

PECEIVED

JAN 2 0 1998

<u>CERTIFIED MAIL - RETURN RECEIPT REQUESTED</u> No. P-443-543-545

Ms. Becky Williams Office of Pollution Control P. O. Box 10385 Jackson, MS 39289-0385 forest

Dear Ms. Williams:

Attached is our EPA Discharge Monitoring Report for the 4th Quarter of 1997.

Very truly yours,

HERCULES INCORPORATED

Charles S. Jordan

Environmental Coordinator

CSJ/vrf





January 13, 1998

Hercules Incorporated 613 West 7th Street P.O. Box 1937 Hattiesburg, MS 39403-1937 (601) 545-3450 Fax: (601) 584-3226

<u>CERTIFIED MAIL - RETURN RECEIPT REQUESTED</u> <u>No. P 443-543-544</u>

Ms. Becky Williams
Office of Pollution Control
P. O. Box 10385
Jackson, MS 39289-0385

Forest



Dear Ms. Williams:

The purpose of this letter is to follow up on our January 8, 1998, phone conversation with Mr. Charles Cook.

On 1/5/98 and 1/7/98, we experienced an excessive amount of rainfall over a relatively short period of time. We received approximately 3.5 inches over a three hour period and approximately 5.4 inches over a 2 hour time period, respectively. We estimate the following amount of primary wastewater bypassing secondary treatment in order to prevent basin overflow:

<u>Date</u> 1/5/98 (2,610	Flow GPM x 140 min.)	TOC	lbs/day	Permit Limit
Bypass	0.37 MGD	20 mg/l	61	3,019
1/7/98 (2,610 Bypass	GPM x 605 min.) 1.58 MGD	23 mg/l	303	3,019

If I can answer any additional questions, please call me at (601) 584-3360.

Very truly yours,

HERCULES INCORPORATED

Charles S. Jordan

Environmental Coordinator

CSJ/vrf

cc: W. D. Langhans, Plant Manager





December 4, 1997

CERTIFIED MAIL - RETURN RECEIPT REQUESTED No. P 443-543-543

Mr. Charles Cook Office of Pollution Control P. O. Box 10385 Jackson, MS 39289-0385

Dear Mr. Cook:

Attached is our EPA Discharge Monitoring Report for November, 1997.

Very truly yours,

HERCULES INCORPORATED

Forest

Charles S. Jordan

Environmental Coordinator

CSJ/vrf



STATE OF MISSISSIPPI

DEPARTMENT OF ENVIRONMENTAL QUALITY

JAMES I. PALMER, JR.

EXECUTIVE DIRECTOR

MEMORANDUM

To:

Becky Williams

From:

Doug Upton

Subject:

Review of Hercules Incorporated Acute Toxicity Test - September 1997

Forest

Date:

December 2, 1997

After careful review it appears that these tests were performed according to the correct EPA methodology.

If you, the permittee, or the contract lab have any questions regarding these tests please do not hesitate to contact me at (601)939-8553.





November 12, 1997

<u>CERTIFIED MAIL - RETURN RECEIPT REQUESTED</u> <u>No. P 443-543-542</u>

Fonest

Mr. Charles Cook
Office of Pollution Control
P. O. Box 10385
Jackson, MS 39289-0385

Dear Mr. Cook:

Attached is our EPA Discharge Monitoring Report for October, 1997.

Very truly yours,

HERCULES INCORPORATED

Charles S. Jordan

Environmental Coordinator

CSJ/vrf



October 9, 1997

CERTIFIED MAIL - RETURN RECEIPT REQUESTED No. P 443-543-541



Mr. Charles Cook
Office of Pollution Control
P. O. Box 10385
Jackson, MS 39289-0385

Dear Mr. Cook:

Attached is our semi-annual Bioassay Report for the period 97-04-01 to 97-09-30.

Very truly yours,

HERCULES INCORPORATED

Charles S. Jordan

Environmental Coordinator

CSJ/vrf



October 8, 1997

CERTIFIED MAIL - RETURN RECEIPT REQUESTED No. P 443-543-540

Mr. Charles Cook Office of Pollution Control P. O. Box 10385 Jackson, MS 39289-0385

Dear Mr. Cook:

Attached is our EPA Discharge Monitoring Report for September, 1997.

Formst

Very truly yours,

HERCULES INCORPORATED

Charles S. Jordan

Environmental Coordinator

CSJ/vrf



STATE OF MISSISSIPPI

DEPARTMENT OF ENVIRONMENTAL QUALITY

JAMES I. PALMER, JR.

EXECUTIVE DIRECTOR

October 1, 1997

CERTIFIED MAIL NO. Z-278-184-059

Charles Jordan, Environmental Manager Hercules Incorporated, 613 West 7th Street P.O. 10385 Hattiesburg, Ms. 39403-1937

Dear Mr. Jordan:

Re: Permit Application No. MSC 0001830

Enclosed is National Pollutant Discharge Elimination System (NPDES) Permit Number MS0001830, which is hereby to reissued. Please note the effluent limitations, schedule of compliance, monitoring requirements, and monitoring reporting dates found in this permit.

This permit is issued in accordance with the provisions of the Mississippi Air and Water Pollution Control Law (Sections 49-17-1, et seq., Mississippi Code of 1972), and the regulations and standards adopted and promulgated thereunder, and under the authority granted to the Mississippi Environmental Quality Permit Board pursuant to Section 402(b) of the Federal Water Pollution Control Act.

Any appeal of this permit action must be made within the 30 day period provided for in Section 49-17-29(4)(b) Mississippi Code of 1972.

Very truly yours,

Charles Cook, P.E.

Enclosure
CEC:cec
cc: Ann Parrish
SRO (w/enclosure)



September 8, 1997

Forest

CERTIFIED MAIL - RETURN RECEIPT REQUESTED No. P 443-543-538

RECEIVED
SEP 15 1997
Dept. of Environmental Quality
Office of Pollution Control

Mr. Charles Cook Office of Pollution Control P. O. Box 10385 Jackson, MS 39289-0385

Dear Mr. Cook:

Attached is our EPA Discharge Monitoring Report for August, 1997.

Also, attached is a Certificate of Authority for our current plant manager.

Very truly yours,

HERCULES INCORPORATED

Charles S. Jordan

Environmental Coordinator

CSJ/vrf



UNITE

REGION 4

ATLANTA I FDEHAL CENTER 100 ALABAMA STREET, S.W. ATLANTA, GEORGIA 30303-3104 FORREST CO

September 9, 1997

REF: 4WM-SWPFB

Mr. Barry Royals, Chief Surface Water Division Office of Pollution Control Mississippi Department of Environmental Quality P.O. Box 10385 Jackson, MS 39289-0385

RE: NPDES Overview

Dear Mr. Royals:

In accordance with the EPA/MSDEQ MOA, we have completed review of the following draft permit(s) and have no objections to the proposed permit conditions.

MS0001830

MS0002950

MS00027847

MS00027847

MS00027847

MS0027847

MS0027847

MS0027847

MS0027847

MS0027847

MS0027847

MS0027847

We request we be afforded an additional review opportunity only if significant changes are made to the permit(s) prior to issuance, or if significant objections to the permit(s) are received. Otherwise, please send us one copy of the final permit(s) when issued.

If you have any questions, please call Marshall Hyatt at (404) 562-9304.

Sincerely,

Douglas F. Mundrick, P.E., Chief

Souda Mundich

Surface Water Permits and Facilities Branch

Water Management Division

Recycled/Recyclable • Printed with Vegetable Oil Based Inks on 100% Recycled Paper (40% Postconsumer)

CERTIFICATE OF AUTHORITY

PURSUANT TO the provisions of the State of Mississippi and the United States Environmental Protection Agency environmental regulations, I, Marshall Steinberg, being a principal executive officer of Hercules Incorporated (herein "the Corporation") of at least the level of Vice President, do hereby certify that I have this day authorized and directed, as my duly authorized representative, the person designated below (being the individual having the responsibility for the overall operation of the regulated facility), to complete, sign, and submit, in the name of and on behalf of the Corporation, all environmental reports, requests for information or permit applications required by federal, state, and/or local issuing authorities. The authority for signing permit applications is being delegated contingent on the prior review and approval of such documents by the appropriate business Environmental Manager.

Authorized Representative:

Walter D. Langhans

Plant Manager

Hattiesburg, MS Plant

Regulated Facility:

Hercules Incorporated

Hattiesburg, MS

IN WITNESS WHEREOF I have hereunto affixed my signature on this 15th day of August, 1997.

HERCULES INCORPORATED

Marshall Steinberg Vice President

Health & Environment

STATE OF DELAWARE

COUNTY OF NEW CASTLE

SWORN TO and subscribed before me, a notary public in the county and state aforesaid, this

15th day of August, 1997.

Notary Public

NOTARY PUBLIC - DELAWARE

My Commission expires:

My commission expires April 10, 2001

HERCULES

Interoffice Memo

August 15, 1997

Mr. Walter D. Langhans Hercules Incorporated Plant Manager Hattiesburg Plant Hattiesburg, Mississippi

RE: **Certificate of Authority**

Dear Mr. Langhans:

The attached Certificate of Authority has been executed by me redelegating to you as Hercules duly authorized representative authority to deal with appropriate federal, state and local authorities on environmental reports, requests for information and permit applications (where such delegation of authority is allowed by the applicable regulation).

This authority is being delegated with the specific understanding that such reports, requests for information and permit applications will be, in all respects, accurate and complete. The authority for signing permit applications is being delegated contingent on the prior review and approval of such documents by the appropriate business Environmental Manager. It is the policy of Hercules Incorporated to maintain full compliance with all laws and regulations and to be fair and factual in all of our dealings with regulatory authorities. In no way should you violate this trust which has been given to you to act as a representative of Hercules in your dealings with agencies.

Very truly yours.

Marshall Steinberg Vice President

Health & Environment

CC:

J. E. Benge - 10

J. S. Bryce - 10

C. S. Jordan - Hattiesburg T. S. Kavanaugh - 10

Letterbook Copy

G. M. Trovei - 10

C. D. Miller - 8

R. L. Williams - 8

K. W. Patterson - 11

FileCopy: Certificate of Authority





August 12, 1997

CERTIFIED MAIL - RETURN RECEIPT REQUESTED No. P 443-543-537

Forest

Mr. Charles Cook Office of Pollution Control P. O. Box 10385 Jackson, MS 39289-0385

Dear Mr. Cook:

Attached is our EPA Discharge Monitoring Report for July, 1997.

Very truly yours,

HERCULES INCORPORATED

Charles S. Jordan

Environmental Coordinator

CSJ/vrf



STATE OF MISSISSIPPI

DEPARTMENT OF ENVIRONMENTAL QUALITY

JAMES I. PALMER, JR.

EXECUTIVE DIRECTOR

August 14,1997

Ms. Donna Reed-Judkins, NPDES Permit Engineer Water Permits and Enforcement Branch Water Management Division U. S. Environmental Protection Agency Region IV 345 Courtland Street, N. E. Atlanta, Georgia 30365

Dear Ms. Judkins:

Re: Hercules Inc. Draft NPDES Permit No. MS0001830 Submittal for EPA Review

Enclosed herewith for your review are copies of the following documents related to the reissuance of the above referenced permit:

Draft Permit modified

It is the judgement of this Bureau that the conditions and effluent limitations of this permit reflect a degree of technology equal to BAT.

The subject permit is scheduled to be Public Notice on August 15, 1997. One change was made in the permit. The maximum phenol limit was changed from 4.9 to 6.6 lbs per day. The average limit remained the same.

Ms. Donna Reed-Judkins, August 14, 1997 Page-2-

If you have any questions regarding the enclosed packet, please do not hesitate to contact us.

Respectfully,

Charles E. Cook, P.E.

Enclosures

cc: Ann Parrish, OPC

Ad #: 00193163 Printed by: 303 on: 8/12/97 at: 11:19 Phone #: (601) 367 52 i (iii) Lines...: 356 Net Cost..: 29.48 - vironmental Name...: MS, Degat 7.28 Tot Paid.:
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Adj? Credits... 0.00 Contact: PO #...: Acct #: 30800 Address: PO Box 1035 Tears? Y CC#? Ordered: 1 Ran: Address: Box #: I MS # of Edits.: 05 E I 303 08/12/97 11/04 City/St: Jarkson Zip...: 3 9-0385 Type: c Status..: n Sub'r: TF.? Class..: How Sold: v Memos: (00) K Start. 1 1:/15/97 Stop: 08/15/97 LPub: Boin (01) Ord Rate Schedule Start Sort Shop Rar S 1 P 08/15/97 08/15/97 [iq] FUBLIC NOTICE Mississippi Environmental Quality= Permit Board= P.O. Pox 10385= Jackson, MS 39209= Telephone No. (601) 961-5171= August 15 237-August 15 513 manufactures 100 4 14 7 6 operat. paper / is descr The envi: project the sta lieves mental commo or the applications Federal standard. the Board cided, bas mation. -Board this containgram mer sel records Permit ceed: evall be c me 📖 🥫 as the made on W WELLS thot me ments . Persons wishing to comment mar or object to the proposed erminations are invited to

submit comments in writing to Jerry Cain at the Permit Board's address shown above, no later than September 15, 1997. All comments received by that date will be considered in the formula" tion of final determinations re" garding the application. A public hearing will be held if the Permit Board finds a significant degree of public interest in the proposed permit. 💌 Additional details about the application and the proposed determination, a sketch showing the location of the discharge, and a copy of the draft permit are available by writing or calling Charles Cook at the Permit Board's address and telephone number shows above. Also, this and other information is avail" able for review and copying dur" ing normal business hours at the Southport Cemter Building lo" cated at 2381 Buthway 80 West, Jackson, Mi. c Tlease being the foregoing to the attention of persons whom you know will be interested.

August 15, 1997<



DEPARTMENT OF ENVIRONMENTAL QUALITY JAMES I. PALMER, JR. EXECUTIVE DIRECTOR

TO:

Postmaster

FROM:

Mississippi Department of Environmental Quality, Office of Pollution

Control

SUBJECT:

Public Notice(s)

DATE:

August 11, 1997

Please post the attached public notice(s) in your Post Office on or before August 14, 1997.

If you are unable to do so or if you have any questions, please contact Harriette Payne at (601) 961-5121.

HDP Attachment



DEPARTMENT OF ENVIRONMENTAL QUALITY

JAMES I. PALMER, JR. EXECUTIVE DIRECTOR

TO:

Librarian

FROM:

Mississippi Department of Environmental Quality, Office of Pollution

Control

SUBJECT:

Public Notice(s)

DATE:

August 11, 1997

Please post the attached public notice(s) in your Library on or before August 14, 1997.

If you are unable to do so or if you have any questions, please contact Harriette Payne at (601) 961-5121.

HDP

Attachment



DEPARTMENT OF ENVIRONMENTAL QUALITY

JAMES I. PALMER, JR.

EXECUTIVE DIRECTOR

TO:

Chancery Clerk

FROM:

Mississippi Department of Environmental Quality, Office of Pollution

Control

SUBJECT:

Public Notice(s)

DATE:

August 11, 1997

Please post the attached public notice(s) in your Courthouse on or before August 14, 1997.

If you are unable to do so or if you have any questions, please contact Harriette Payne at (601) 961-5121.

HDP

Attachment

~48-



DEPARTMENT OF ENVIRONMENTAL QUALITY

JAMES I. PALMER, JR.

EXECUTIVE DIRECTOR

August 7, 1997

III OPY

The Clarion Ledger 201 S. Congress P. O. Box 40 Jackson, Mississippi 39205

Gentlemen:

Enclosed herewith are legal notices to be published in your newspaper on August 15, 1997.

Please furnish this office with statement and proof of publications in duplicate. If you have any questions, please contact Harriette Payne at 961-5121.

Very truly yours,

Barry S. Royals, P.E., Chief Surface Water Division

BSR:hdp Enclosure

cc: Ms. Pamela Mitchell (Division 1200)





DEPARTMENT OF ENVIRONMENTAL QUALITY

JAMES I. PALMER, JR.

EXECUTIVE DIRECTOR

August 7, 1997

Hattiesburg American 825 N. Main Street Hattiesburg, Mississippi 39401

Gentlemen:

Re: Hercules Incorporated Hattiesburg/Forrest

Enclosed herewith is a legal notice to be published in your newspaper on August 15, 1997.

Please furnish this office with statement and proof of publications in duplicate. If you have any questions, please contact Harriette Payne at 961-5121.

Very truly yours,

Barry S. Royals, P.E., Chief Surface Water Division

BSR:hdp Enclosure

cc: Ms. Pamela Mitchell (Division 1200)



file Fornest Co

STATE OF MISSISSIPPI

DEPARTMENT OF ENVIRONMENTAL QUALITY

JAMES I. PALMER, JR.

EXECUTIVE DIRECTOR

August 6, 1997

Charles Jordan, Environmental Manager Hercules Incorporated, 613 West 7th Street P.O.10385 Hattiesburg, Ms. 39209

Dear Mr. Jordan:

Re: NPDES Permit No. MS0001830

Shortly the Mississippi Environmental Quality Permit Board will consider the reissuance of the referenced National Pollutant Discharge Elimination System (NPDES) Permit. The enclosed draft permit contains conditions which we intend to incorporate as part of your final permit. Also enclosed is a Public Notice dated June 1 which is the beginning of a 30-day comment period during which the general public's input and comments are invited. If you have not already done so, you are also invited to submit written comments by no later than August 30,1997. A decision regarding the proposed issuance will be made by the Permit Board after all public comments have been duly considered.

Should you have any questions or wish to discuss this matter, please contact me at 601/961-5171.

Sincerely,

Charles E. Cook, P.E. Industrial NPDES Section

CEC:cec Enclosure



Hercules Incorporated 613 West 7th Street P.O. Box 1937 Hattiesburg, MS 39403-1937 (601) 545-3450 Fax: (601) 584-3226

July 23, 1997

<u>Certified Mail - Return Receipt Requested</u> <u>No. P 443-543-534</u>

Becky Ornelas
Industrial NPDES Section
State of Mississippi
Dept. Of Environmental Quality
P. O. Box 10385
Jackson, MS 39289-0385

PECEIVED

JUL 25 1997

Since of Pollution Control Outsity

RE:

NPDES Permit No. MS0001830

June 1997 DMR

Dear Ms. Ornelas:

Attached is the corrected Discharge Monitoring Report to which you referred in your letter of July 17, 1997.

Sincerely,

HERCULES INCORPORATED

Charles 8. Jordan

Environmental Coordinator

CSJ/vrf

Attachment:



DEPARTMENT OF ENVIRONMENTAL QUALITY

JAMES I. PALMER, JR.

EXECUTIVE DIRECTOR

July 17, 1997

FILE COPY

Mr. Gerald Burch Plant Manager Hercules, Inc. P.O. Box 1937 Hattiesburg, MS 39401-1937

Dear Mr. Burch:

Re: Hercules, Inc.

Forrest County-Hattiesburg

June 1997 DMR's

NPDES Permit No. MS0001830

After careful review of your Discharge Monitoring Report for the June 1997, the following deficiencies were noted:

The frequency of analysis and sample type were not reported.

We request that you resubmit the Discharge Monitoring Reports with all parts filled out correctly on or before July 31, 1997. If you have any questions concerning this matter, do not hesitate to call me at 961-5171.

Very truly yours,

Becky Ornelas Industrial NPDES Section

BO:dht Enclosures



Hercules Incorporated 613 West 7th Street P.O. Box 1937 Hattiesburg, MS 39403-1937 (601) 545-3450 Fax: (601) 584-3226

July 15, 1997

RECEIVED

JUL 1 6 1997

Ject, of Environmental Quality
Office of Pollution Control

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

No. P 443 543 522

Mr. Charles Cook
Office of Pollution Control
P. O. Box 10385
Jackson, MS 39289-0385

Dear Mr. Cook:

Attached is our EPA Discharge Monitoring Report for June 1997.

Following our previous phone conversation, G.C./M.S. analysis of retained samples indicate the apparent Phenol excursion on 6/4/97 to be 4-methyl Phenol.

Very truly yours

Charles Jordan

Environmental Coordinator

CSJ/nb

Attachment

THE STANGER





DEPARTMENT OF ENVIRONMENTAL QUALITY

JAMES I. PALMER, JR.

EXECUTIVE DIRECTOR

July 9, 1997

Charles Jordan, Environmental Manager Hercules Incorporated, 613 West 7th Street P. O. Box 10385 Hattiesburg, MS 39209

Dear Mr. Jordan:

Re: Permit Application No. MS0001830

Hercules' comments dated June 26, 1997, are addressed as follows:

- 1) The receiving stream is a tributary of the Bowie River. This is based on our site visit and will not change.
- 2) The 10.7% LCso is based on the flow rate of outfall 002.
- 3a) Chronic Bioassay is required for effluent with an IWC of greater than one percent. This is the case with the limits on the 7Q10 = 0 stream.
- 3b) The metals did not pass the Toxicity Screening and require additional sampling. This should have been in the previous draft.
- 4) cmt noted, Acute bioassay requirements are used according to our regulations and toxicity matrix.
- 5) cmt noted, Acute bioassay requirements are used according to our regulations and toxicity matrix.
- 6a) same as reply for comment no.1
- 6b) The 935,655 lbs of production was taken from the permit application.
- The proposed limit for phenol is based on the past permit. This limit can not be changed due to the anti-backsliding rule. The only way we can adjust the limit is if you can illustrate how the process has changed from the past permitting period to cause an increase in phenol.
- 6d) The TOC requirement is based on the last permit and will remain.

Mr. Charles Jordan July 9, 1997 Page - 2-

Hercules' comments dated April 29, 1997, are addressed as follows:

- 1) It is agreed to grant 3 years to comply with the limits required by the 7Q10 = 0 stream.
- 2) Your request for a pH limit of 6.0-9.0 S.U. will require a stream study. As we have discussed, you preferred the 6.5 9 pH limit over doing a stream study.
- 3) Your request for usage of monthly production numbers for categorical limit determination has been addressed for BOD5 and TSS.

We consider the changes to be more stringent than the requirements in the draft for public notice. Enclosed is a copy of the final draft.

Please provide comments no later than July 16, 1997. If you have any questions, please do not hesitate to contact me at 961-5171.

Sincerely,

Charles Cook, P.E.

Industrial NPDES Section

CEC:dht Enclosure memo to file

7/7/97

Subject: Hercules, permit No.MS0001830, changes to public notice draft.

The draft was changed to correct the acute toxicity limit from 3% to 10.7%. The outfall 001 was changed to outfall 002 for the purpose of testing the entire effluent. These changes are more stringent and do not require a public notice to be re-advertised. Also the monitoring requirement for TOC has been reduced to once per month.

CEC:cec



CERTIFIED MAIL RETURN RECEIPT REQUESTED No. P 443 543 529



Hercules Incorporated 613 West 7th Street P.O. Box 1937 Hattiesburg, MS 39403-1937 (601) 545-3450 Fax: (601) 584-3226

June 26, 1997

Mr. Charles E. Cook, P. E.
Industrial Wastewater Control Branch
Office of Pollution Control
Mississippi Department of Environmental Quality
P. O. Box 10385
Jackson, MS 39289-0385

RE: Hercules Incorporated
NPDES Permit No. MS0001830
Comments on Draft Permit

Dear Mr. Cook:

In your letter of January 9, 1997, the industrial NPDES section forwarded to Hercules a proposed draft NPDES permit.

As you are aware, Hercules participated in a series of conferences with the Office of Pollution Control subsequent to the January 9, 1997, letter. Among other issues, Hercules and DEQ focused on the issue of the "first receiving waters". For example, in the current permit issued October 22, 1991, Hercules has been granted permission to discharge wastewater into the Bouie River.

By letter of April 29, 1997, a copy of which is attached, I wrote to you providing additional comments on the draft permit of January 9, 1997.

We respectfully request that the Department of Environmental Quality and the Permit Board consider the following comments, among others:

- 1. The first receiving waters should be described as "the Bouie River" for the interim 3 year period from the date of permit issuance.
- 2. PART 1, A, 5, page 2 of 24; Comment: While acute bioassay requirements were a part of the January 9, 1997 draft, the effluent limitations and monitoring

Mr. Charles E. Cook, P. E. June 26, 1997 Page 2

requirements did not contain the provision "the LCD_{50} shall pass a less than or equal to 3% of the effluent". Although the acute bioassay requirements were contained in Part III of the January 1997 draft, these requirements related only to outfall 002. There is no rationale or prior discussion for the insertion of these requirements at outfall 001.

6:00 4

- PART 1, A, page 4 of 24 (Outfall 001-3 years after permit issuance, and lasting until 2002): There is no explanation or prior discussion for the following:
 - (a) The addition of chronic bioassay requirements; and
 - (b) The inclusion of sampling for aluminum, boron, nickel, selenium and zinc.
- 4. PART III: There is no explanation or prior discussion for the insertion of additional language in Part III, D Other standard conditions relating to acute biomonitoring and chronic biomonitoring. These additional provisions did not appear in the January 9, 1997 draft permit.
- 5. PART III Chronic Bioassay Requirements: In the January 9, 1997, draft, there was no provision or prior discussion relating to chronic bioassay requirements. There does not appear to be an explanation for the inclusion of chronic bioassay requirements at outfall 001 as part of the effluent limitations and monitoring requirements for the period of three years after permit issuance and lasting until 2002.

6. Permit Rationale:

- (a) Paragraph IV Receiving waters should use the designation "the Bouie River" rather than an unnamed tributary of the Bouie River for the interim 3 year period from the date of permit issuance.
- (b) Paragraph X(1)(B) The factor used should be 1,247,642 / 1,292,400 = 0.965.
- (c) Paragraph X(d) As you are aware, our phenol limits are on the order of magnitude 60 times more stringent than the current State water quality for the interim 3 years. As you know, we have difficulty even without manufacturing phenolic resins. We request some relief. Double current limits, which would still be much more stringent than State water quality standards.

Mr. Charles E. Cook, P. E. June 26, 1997 Page 2

(d) Paragraph XI - Drop TOC analysis requirements, since they are an order of magnitude 10 times higher than BOD.

We sincerely appreciate your considering the above comments in the review process.

Very truly yours,

HERCULES INCORPORATED

Charles S. Jordan

Environmental Coordinator

CSJ/vrf

cc: Douglas A. Cox, Plant Manager

Enclosure:







Hercules Incorporated 613 West 7th Street P.O. Box 1937 Hattiesburg, MS 39403-1937 (601) 545-3450 Fax: (601) 584-3226

CERTIFIED MAIL - RETURN RECEIPT REQUESTED No. P 443 543 527

June 11, 1997

Mr. Charles Cook
Bureau of Pollution Control
P. O. Box 10385
Jackson, MS 39289-0385

Dear Mr. Cook:

Following our recent phone conversation, please find the following information relative to the maintenance of our carbon regeneration furnace water scrubber associated with our NPDES wastewater treatment permit.

Because of the deteriorated condition of the Sly scrubber, we are replacing it with a more efficient Fisher-Klosterman scrubber.

If I can answer any additional questions please call me at 601-545-3450, ext. 360.

Very truly yours,

HERCULES INCORPORATED

Charles S. Jordan

Environmental Coordinator

CSJ/vrf

cc: B. J. Hailey - OPC

Attachment:



DEPARTMENT OF ENVIRONMENTAL QUALITY

JAMES I. PALMER, JR.

EXECUTIVE DIRECTOR



May 27, 1997

Hattiesburg American 825 N Main Street Hattiesburg, Mississippi 39401

Gentlemen:

Re: Hercules

Hattiesburg/Forrest

Enclosed herewith is a legal notice to be published in your newspaper on June 1, 1997.

Please furnish this office with statement and proof of publications in duplicate. If you have any questions, please contact Harriette Payne at 961-5121.

Very truly yours,

Barry S. Royals, P.E., Chief Surface Water Division

BSR:hdp Enclosure

cc: Ms. Pamela Mitchell (Division 1200)



DEPARTMENT OF ENVIRONMENTAL QUALITY

JAMES I. PALMER, JR.

EXECUTIVE DIRECTOR



May 27, 1997

The Clarion Ledger 201 S. Congress Jackson, Mississippi 39205

Gentlemen:

Re: Condea Vista

Aberdeen/Monroe

Hercules

Hattiesburg/Forrest

Kerr McGee Hamilton/Monroe

Prestage Farms, Inc. PM-3 & PM-4

Pheba/Clay

Prestage Farms, Inc. PM-1, PM-2 & Isolation #4

Crawford/Lowndes

Enclosed herewith are legal notices to be published in your newspaper on June 1, 1997.

Please furnish this office with statement and proof of publications in duplicate. If you have any questions, please contact Harriette Payne at 961-5121.

Very truly yours,

Barry S. Royals, P.E., Chief Surface Water Division

BSR:hdp Enclosure

cc: Ms. Pamela Mitchell (Division 1200)







DEPARTMENT OF ENVIRONMENTAL QUALITY

JAMES I. PALMER, JR.

EXECUTIVE DIRECTOR

TO:

Postmaster

FROM:

Mississippi Department of Environmental Quality, Office of Pollution

Control

SUBJECT:

Public Notice(s)

DATE:

May 27, 1997

Please post the attached public notice(s) in your Post Office on or before June 1, 1997.

If you are unable to do so or if you have any questions, please contact Harriette Payne at (601) 961-5121.

HDP Attachment



DEPARTMENT OF ENVIRONMENTAL QUALITY JAMES I. PALMER, JR. EXECUTIVE DIRECTOR

TO:

Librarian

FROM:

Mississippi Department of Environmental Quality, Office of Pollution

Control

SUBJECT:

Public Notice(s)

DATE:

May 27, 1997

Please post the attached public notice(s) in your Libraray on or before June 1, 1997.

If you are unable to do so or if you have any questions, please contact Harriette Payne at (601) 961-5121.

HDP Attachment



DEPARTMENT OF ENVIRONMENTAL QUALITY JAMES I. PALMER, JR. EXECUTIVE DIRECTOR



TO:

Chancery Clerk

FROM:

Mississippi Department of Environmental Quality, Office of Pollution

Control

SUBJECT:

Public Notice(s)

DATE:

May 27, 1997

Please post the attached public notice(s) in your Courthouse on or before June 1, 1997.

If you are unable to do so or if you have any questions, please contact Harriette Payne at (601) 961-5121.

HDP

Attachment









CHEMICAL SPECIALTIES

<u>Certified Mail -Return Receipt Requested</u> #Z 079 760 448

Charles Cook Office of Pollution Control P. O. Box 10385 Jackson, MS 39289-0385

Dear Mr. Cook:

April 29, 1997

Hercules Incorporated 613 West 7th Street P.O. Box 1937 Hattiesburg, MS 39403-1937 (601) 545-3450 Fax: (601) 584-3226



The purpose of this letter is to document previous discussions related to the first draft of our upcoming NPDES permit renewal.

As you are aware, our management intentions are to eventually discharge our industrial effluent to the city POTW as soon as the logistics can be finalized to everyone's satisfaction. Following this scenario and previous discussions, we will have a "two part" permit. The first part will essentially be a renewal of our existing permit and the second part will address discharging our contaminated industrial wastewater to the city POTW.

Based on the above rationale, we respectfully request the following:

We request that the first part of the permit, as was originally agreed to, be a full three years from the time of permit reissuance. This is to allow us time to work with the city to physically place our effluent into either a dedicated line or into the city's existing system.

We request, in order to be consistent with past precedent, that the pH limits in the permit remain 6.0 to 9.0, as prescribed in the applicable categorical effluent guidelines.

We request, in order to be consistent with past precedent, that the discharge limitations in the first part of the permit be based on actual monthly production quantities reported in the original permit application for the following reason. These production quantities are reported on page 2 of 4(B) in the original permit application and are consistent with the past rationale for developing our permit discharge limitations based on existing categorical effluent guidelines. Because of our cyclic production based on supply and demand, we believe this approach best represents our diversified operations, and again, is consistent with past rationale.

If I can answer additional questions, please call me at (601) 545-3450, extension 360.

Very truly yours,

HERCULES INCORPORATED

Charles S. Jordan

Environmental Coordinator

cc: Gerald Burch



CHEMICAL SPECIALTIES

April 29, 1997

Hercules incorporated 613 West 7th Street P.O. Box 1937 Hattiesburg, MS 39403-t (601) 545-3450 Fax: (601) 584-3226

Certified Mail -Return Receipt Requested #Z 079 760 448

Charles Cook
Office of Pollution Control
P. O. Box 10385
Jackson, MS 39289-0385

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If I can answer additional questions, please call me at (601) 545-3450, extension 360.

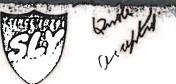
Very truly yours,

HERCULES INCORPORATED

Charles S. Jordan

Environmental Coordinator

cc: Gerald Burch



PH-433-0 (Rev.#7)

July 27, 1984

Hercules, Inc. P.O. Drawer 1937 Hattiesburg, MS 39401

Attention: Mr. Jeff Brown

Inquiry 042-117-83, Suppl. 2 Sly IMPINJET Gas Scrubber For Carbon Regeneration Furnace Job 006614

Gentlemen:

We thank you for your continued interest in Sly's Scrubbers and for the opportunity to submit this revision to our recent proposals This revision supersedes our previous quotations. The following confirms our telephone conversation of July 27, 1984.

We understand that the proposed scrubber is to collect 19 lb/hr of carbon from 8055 ACFM at 535°F. consisting of 17,467 lb/hr dry gas and 1121 lb/hr of water vapor from a Westvaco Fluidized Bed Carbon Regeneration Furnace. Our calculations show that if normal quantities of water (25 GPM total) are employed, the outlet would be 5480 ACFM at 140°F. saturated including 2672 lb/hr water vapor.

We are pleased to guarantee that the proposed scrubber will provide the requested 95% efficiency as long as the incoming particles are no finer than the given 80% below 50 microns and 20% between 50 microns to 1/16 inch. Sly's very conservative curves predict over 98.75% on the given particle size distribution.

We calculate that the fan will have to deliver the 5480 ACFM and a static pressure of 10.4" at conditions (13" SP at start up). Since Westinghouse does not suggest using a 426M Industrial Fan for less than 9000 CFM at 15" SP, we would not use the existing fan and we are quoting a smaller fan selected so that the desired delivery is on the appropriate portion of the fan curve.

MSPERF

HERCULES, INC FKP 95-0747, REV 1 8-23-95 RDC PAGE 1 OF 1 PAGE(S)

Fisher-Klosterman MS-350-M

SCRUBBER PERFORMANCE

GAS FLOW CONDITIONS AT SCRUBBER INLET
GAS FLOW RATE, A.C.F.M.: 5506.0
GAS DENSITY, LBS./CU. FT.: 0.0611
GAS VISCOSITY, LBS.(MASS)/FT.-SEC.: 0.12077E-04

PARTICULATE CONDITIONS AT SCRUBBER INLET PARTICULATE SPECIFIC GRAVITY: 1.500

THE WATER FLOW RATE IS 4.000 GAL./1000A.C.F.

SCRUBBER SELECTION AND PERFORMANCE
SCRUBBER TYPE AND SIZE: MS- 350-M
NUMBER IN PARALLEL: 1
CIRCULATING LIQUID RATE: 4.0 GAL./1000A.C.F.
PRESSURE DROP, INCHES W.C.: 6.50
GAL/A.C.F. ABOVE AT 40 PSI MINIMUM AT DELIVERY WITH LESS THAN 2% SUSPENDED SOLIDS.

NOTE: UNLESS QUOTED PH CONTROL BY OTHERS

FRACTIONAL EFFICIENCY CURVE: STOKES EQUIV. % EFFICIENCY

STOVES FOOTA.	4 ELLICIENC
DIA., MICRONS	BY WEIGHT
070	19.81
0.80	27.28
0.90	34.98
1.00	42.57
1.10	49.83
1.20	56.60
1.30	62.78
1.40	
1.50	73.26
1.60	77.56
1.90	81.63
2.20	87.14
2.60	92.07
3.20	96.21
4.90	99.54

- NCLES: 1. LIQUID RATE DOES NOT INCLUDE EVAPORATION LOSSES.
 - 2. PERFORMANCE IS BASED ON PARTICLE SIZES EXPRESSED IN STOKES EQUIVALENT DIAMETERS AS DETERMINED BY THE BAHCO MICRO-PARTICLE CLASSIFIER AS SPECIFIED





DEPARTMENT OF ENVIRONMENTAL QUALITY

JAMES I. PALMER, JR.

EXECUTIVE DIRECTOR

June 13, 1997



Mr. Gerald Burch Plant Manager Hercules, Inc. P. O. Box 1937 Hattiesburg, MS 39401-1937

Dear Mr. Burch:

Re: Hercules, Inc.

Forrest County-Hattiesburg
Compliance Inspection Report
NPDES Permit No. MS0001830

Review of your Discharge Monitoring Report for May 1997, indicates that the frequency of analysis and sample type were not reported. Enclosed is the original Discharge Monitoring Report. We request that you resubmit the corrected report to this office on or before June 26, 1997. If you have any questions concerning this matter, do not hesitate to call me at 961-5171

Very truly yours,

Becky Ornelas Industrial NPDES Section

BO:dht Enclosures





Hercules Incorporated 613 West 7th Street P.O. Box 1937 Hattiesburg, MS 39403-1937 (601) 545-3450 Fax: (601) 584-3226

<u>CERTIFIED MAIL - RETURN RECEIPT REQUESTED</u> <u>P 443 543 526</u>



June 11, 1997

Mr. Charles Cook
Bureau of Pollution Control
P. O. Box 10385
Jackson, MS 39289-0385

Dear Mr. Cook:

Attached is our EPA Discharge Monitoring Report for May, 1997. In addition, the signed Certificate of Authority for Douglas A. Cox has been attached.

Very truly yours,

HERCULES INCORPORATED

Charles Jordan / of

Charles Jordan

Environmental Coordinator

CSJ/vrf

Attachment:



Hercules Incorporated 613 West 7th Street P.O. Box 1937 Hattiesburg, MS 39403-1937

(601) 545-3450 Fax: (601) 584-3226

MAY 1 5 1997

May 12, 1997

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

No. Z 079 760 406

Mr. Charles Cook
Office of Pollution Control
P. O. Box 10385
Jackson, MS 39289-0385

Dear Mr. Cook:

Attached is our EPA Discharge Monitoring Report for April 1997.

Very truly yours,

Charles Jordan

Environmental Coordinator

CSJ/nb

Attachment







DEPARTMENT OF ENVIRONMENTAL QUALITY

JAMES I. PALMER, JR.

EXECUTIVE DIRECTOR

May 1, 1997

Mr. Gerald Burch Plant Manager Hercules, Inc. P.O. Box 1937 Hattiesburg, MS 39401-1937



Dear Mr. Burch:

Re: Hercules, Inc.

Forrest County-Hattiesburg
Compliance Inspection Report
NPDES Permit No. MS0001830

Enclosed is a copy of the NPDES Compliance Monitoring Inspection Report and sampling that was performed at Hercules, Inc. on March 31, 1997. The results of this inspection should be used by you as a guide for complying with requirements and limitations as stated by your NPDES permit. The sampling results indicate that the effluent was in compliance with your NPDES permit limits.

If you have any questions concerning this matter, please contact me at 961-5171.

Respectfully,

Becky Ornelas Industrial NPDES Section

BO:bo Enclosures

cc: Mr. Arthur Collins, EPA (w/enclosures)

SRO

Mr. Paul Zetterholm (w/ enclosures)





Hercules Incorporated 613 West 7th Street P.O. Box 1937 Hattiesburg, MS 39403-1937 (601) 545-3450 Fax: (601) 584-3226

Forest

April 25, 1997



CERTIFIED MAIL - RETURN RECEIPT REQUESTED

No. Z 079 760 444

Mr. Charles Cook Office of Pollution Control P. O. Box 10385 Jackson, MS 39289-0385

Dear Mr. Cook:

Attached is our semi-annual EPA Discharge Monitoring Report for Bioassay monitoring.

Very truly yours,

Charles Jordan

Environmental Coordinator

CSJ/nb

Attachment

Ceriodaphnia dubia ACUTE BIOASSAY

CLIENT: HERCULES, INC. DATE STARTED: 03/26/97 TIME STARTED: 9:15 P.M. ANALYST: RMS

NUMBER	DEAD

REP #		АВ		В	С		D	
HOURS	24	48	24	48	24	48	24	48
D %	0	0	0	С	0	0	0	0
6.25%	0	0	0	0	0	0	0	0
12.5%	0	0	0	0	0	0	0	0
25	0	0	0	0	0	0	0	0
50%	0	0	0	0	0	0	0	0
1004	0	0	0	0	0	0	0	0

LABORATORY NOTES:

Test Method: 48-hr acute definitive bioassay

Species: Ceriodaphnia dubia (water flea)

Age: <24hr-old No. Replicates: No. Organisms/Rep: 5

No. Dilutions: 5 + control Sample I.D.: Final Ditch Date Initiated: 3/26/97

TOTAL DEAD (FOR LC₅₀ DETERMINATION):

0 8 -6.25% -12.5% -25% -50% -

100% -

 $LC_{50} > 100$ %

RAW DATA CERTIFIED BY:

DATE: 4/23/97

FATHEAD MINNOW ACUTE BIOASSAY

CLIENT: HERCULES, INC. DATE STARTED: 03/26/97 TIME STARTED: 10:45 P.M. ANALYST: RMS

	NUMBER DEAD								
REP #	A			a A			В		
HOURS	24	48	72	96	24	48	72	96	
0 %	0	0			0	0			
6.25	0	0			0	0			
12.5	0	0			0	0			
25	0	0			0	0			
50%	0	0			0	0			
100%	0	0			0	0			

LABORATORY NOTES:

Test Method: 48-hr acute definitive bioassay Species: Pimephales promelas (fathead minnow)

Age: <24hr-old
No. Replicates: 2
No. Organisms/Rep: 10

No. Dilutions: 5 + control Sample I.D.: Final Ditch Date Initiated: 3/26/97

TOTAL DEAD (FOR LC₅₀ DETERMINATION):

0% - 0
6.25% - 0
12.5% - 0
25% - 0
50% - 0
100% - 0

 $LC_{50} = > 100%$

RAW DATA CERTIFIED BY: Rich M. Lleuand DATE: 4/23/97



Certified Mail
Return Receipt Requested
Z 079 760 363

Hercules Incorporated 613 West 7th Street

P.O. Box 1937 Hattiesburg, MS 39403-1937 (601) 545-3450

Fax: (601) 584-3226

April 18, 1997

APR 2 2 1997

Jept. of Environmental Quality
Office of Pollution Community

Wm. Stephen Spengler, P.E., Chief Industrial NPDES Section Office of Pollution Control P. O. Box 10385 Jackson, MS 39289-0385

Dear Mr. Spengler:

Please find the following response to your letter request of April 11, 1997.

I have enclosed previous correspondence with Mrs. Ashford and her attorney. I trust this satisfies your request. If I can answer any additional questions or provide additional information, please call me at 545-3450 ext. 360.

Very truly yours,

HERCULES INCORPORATED

Charles S. Jordan

Environmental Coordinator

CSJ/vrf

cc: Gerald Burch

Rich Williams
Louie Ruffin





Hercules Incorporated 613 West 7th Street P.O. Box 1937 Hattiesburg, MS 39403-1937 (601) 545-3450 Fax: (601) 584-3226

April 18, 1997

<u>Certified Mail - Return Receipt Requested</u> Z 079 760 443 Garest

APR 2 1 1997

Becky L. Ornelas Office of Pollution Control P. O. Box 10385 Jackson, MS 39289-0385

Dear Becky:

Following our recent phone conversation, please find the additional information.

Attached is the corrected DMR report preprinted date which reflects the correct monitoring period as indicated in the original submittal cover letter. Please excuse any inconvenience this may have caused.

If I can answer any additional questions, call me at 601-545-3450, Ext. 360.

Very truly yours,

Charles Jordan

Environmental Supervisor

CJ:nb







STATE OF MISSISSIPPI

DEPARTMENT OF ENVIRONMENTAL QUALITY

JAMES I. PALMER, JR.

EXECUTIVE DIRECTOR

MEMORANDUM

TO: Dwight Wylie

FROM: Steve Spengler

THROUGH: Barry Royals, Jerry Cain

SUBJECT: Hercules Complaint

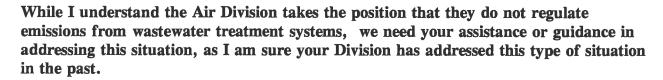
DATE: April 14, 1997

During the past two weeks, I have had several telecons with Ms. Willie Merle Ashford, who lives near the Hercules facility in Hattiesburg. According to Ms. Ashford, there was an odorous release into the air from a large bulk tank at Hercules during the month of October, 1996. According to Ms. Ashford, her house is now contaminated, and she is now suffering health problems(respiratory), as a result of this incident. She claims the odor was so bad in her house that she could not reside in it until January, 1997. She wants someone to decontaminate her house or, at least sample it to find out what the problem is.

I have contacted the Air Division and Hazardous Waste Division to determine if they were aware of any unusual incidents during this timeframe. They were not aware of anything. I also contacted Charlie Jordan, Environmental Manager, with Hercules. He indicated that he was aware of Ms. Ashford's complaints and that her lawyer and Hercules' lawyer were in correspondence. Charlie indicated that their 5 million gallon storage tank may have been the source of this problem, as it was being cleaned out during this period. This tank holds primary treated wastewater prior to carbon adsorption.

Last week

Yesterday I talked with Lydia Rogers, with Trent Lott's office, regarding this complaint. Ms. Rogers indicated that Ms. Ashford is calling daily to find out what is being done to address this situation. I have responded to both that we cannot require Hercules to "clean" this house, and it is difficult for us to determine the extent of the problem, since our office was not notified until 5 months after the alleged incident took place. I did tell them that I was preparing a letter to Hercules informing them of the allegation and requesting that they respond.



Enclosed, find a copy of the letter that is being transmitted to Hercules. We would appreciate a timely response. Thanks.



Hercules Incorporated 613 West 7th Street P.O. Box 1937 Hattiesburg, MS 39403-1937

(601) 545-3450 Fax: (601) 584-3226

April 14, 1997



CERTIFIED MAIL - RETURN RECEIPT REQUESTED

No. Z 079 760 442

Mr. Charles Cook Office of Pollution Control P. O. Box 10385 Jackson, MS 39289-0385

Dear Mr. Cook:

Attached is our EPA Discharge Monitoring Report for March 1997.

Very truly yours,

Charles Jordan

Environmental Coordinator

CSJ/nb

Attachment









STATE OF MISSISSIPPI

DEPARTMENT OF ENVIRONMENTAL QUALITY

JAMES I. PALMER, JR.

EXECUTIVE DIRECTOR

April 11, 1997

CERTIFIED MAIL NO. Z 732 437 517

Mr. Charles Jordan Hercules, Inc. P. O. Box 1937 Hattiesburg, Mississippi 39403-1937

Dear Mr. Jordan:

Re: Complaint Investigation

Our office is investigating a complaint which we recently received regarding an allegation that an odorous release into the air from Hercules occurred during October 1996. The complainant alleges that the odors were released from a tank on Hercules' property, and has contaminated their residence, and resulted in health problems. I have discussed this issue with our Air Division as well as our Emergency Response Branch. Neither of these have any records of complaints or notifications regarding any unusual events at Hercules during that time frame. The complainant indicated that Hercules was notified of this situation when the alleged release occurred.

We request that Hercules inform our office of any situations at the site which might have resulted in any unusual odors, and if so, what remedial actions have been taken to preclude this from happening in the future.





Mr. Charles Jordan April 10, 1997 Page -2-

Please respond to this letter in writing within 10 days of receipt. If you have any questions, do not hesitate to contact me.

Sincerely,

Wm. Stephen Spengler, P. E., Chief Industrial NPDES Section

WSS:dht

ec: Mr. Jerry Banks, OPC

Mr. Wayne Anderson, OPC

bc: Ms. Willie Merle Ashford

Ms. Lydia Rogers, Office of Senator Trent Lott



Hercules Incorporated 613 West 7th Street P.O. Box 1937 Hattiesburg, MS 39403-1937 (601) 545-3450 Fax: (601) 584-3226

March 27, 1997

Certified Mail - Return Receipt Requested # Z 079760358

Robert C. Arledge, Esq. Schwartz & Associate, P.A. P. O. Box 3949 Jackson, MS 39207

Dear Mr. Arledge:

In reference to your letters of December 10, 1996, and March 5, 1997, a response to the December 10 letter was prepared for mailing on February 17. However, due to an administrative error, the mailing of the letter never occurred. It is enclosed. I apologize for the delay.

Very truly yours,

Gerald D. Burch Plant Manager

GDB/vrf

Enclosures:

cc: Dorrance Aultman, Esq. - Aultman, Tyner, McNeese, Ruffin & Laird, Ltd.



Hercules Incorporated 613 West 7th Street P.O. Box 1937 Hattiesburg, MS 39403-1937 (601) 545-3450 Fax: (601) 584-3226

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March 20, 1997



CERTIFIED MAIL - RETURN RECEIPT REQUESTED

No. Z 079 760 424

Mr. Charles Cook Office of Pollution Control P. O. Box 10385 Jackson, MS 39289-0385

Dear Mr. Cook:

Attached is our EPA Discharge Monitoring Report for February 1997.

Very truly yours,

Charles Jordan

Environmental Coordinator

CSJ/nb

Attachment

Schwartz & Associates, P.A.

Attorneys at Law

Richard B. Schwartz David G. Galyon Neil A. Mabry* Robert C. Arledge* B. Kendall Griffin

Telephone (601) 353-1215 (800) 844-1215 Fax (601) 948-3822 Physical Address: 134 East Amite Street Jackson, Mississippi 39201

Mailing Address: P.O. Box 3949 Jackson, Mississippi 39207

*also licensed in Texas

*also licensed in Louisiana

March 5, 1997

Hercules, Inc. Gerald Birch, Plant Manager 613 West 7th Street Hattiesburg, Mississippi 39401

Re: Arthur and Willie Ashford v. Hercules, Inc.

Dear Mr. Birch:

Several weeks ago we sent you a letter advising you of our representation of the captioned claimants. To date we have had no response from Hercules, Inc. We'd greatly appreciate it if you or your legal department would contact us at your earliest convenience so that we might discuss this matter.

If you have any questions regarding this claim, please do not hesitate to contact me.

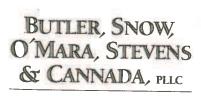
Yours Very Truly,

Robert C. Arledge

RCA/jdm

cc:

Willie Ashford Arthur Ashford



ATTORNEYS AT LAW

17TH FLOÓR
DEPOSIT GUARANTY PLAZA
210 EAST CAPITOL STREET
JACKSON, MISSISSIPPI 39201
POST OFFICE BOX 22567
JACKSON, MISSISSIPPI 39225-2567
(601) 948-5711
FACSIMILE: (601) 949-4555

March 5, 1997

HARDLD D. MILLER, JR. LAWRENCE J FRANCK C. FUGENE MCROBLRTS JR JOHN A CRAWFORD D CARL BLACK IR LAUCH M. MAGRUDER IR. HUGH C MONTGOMERY JR IAMES W OMARA W SCOTT WELCH III JAY A TRAVIS III LEE DAVIS THAMES CHARLES L BROCATO KENNETH W BARTON CHARLES F JOHNSON III STEPHEN W ROSENBLATT JAMES S. OVERSTREET, IR HERBERT C. EHRHARDT CHRISTY D IONES DON B CANNADA PHIL B ABERNETHY W. EUGEN MAGEE THOMAS E WILLIAMS EDWARD A WILMESHERR R. BARRY CANNADA

THOMAS JOHN C. HENE ROBERT A MILLER J. CARTER THOMPSON, JR. DANIEL G. HISF JEFFREY A WALKER PAUL N. DAVIS PAUL VARNER STEVENSON RAY MARCUS WIGGS III JAMIE PLANCK MARTIN PAULA GRAVES ARDELEAN LESLIE JOYNER BOBO ANN FORTENBERRY CORSO O KENDALL MOORE ROBERT M FREY GILBERT C VAN LOON THOMAS A WEBB CAMILLE HENICK FVANS RONALD G. TAYLOR I COLLINS WOHNER IR DONNA BROWN JACOBS SFLBY A IRELAND WILLIAM M. GAGE

file: Forrest Co.

MICHAEL & MINISTERNAM STEPHANIEM RUPPER

STEPHANIEM RUPPER

STEPHANIE M. RIPPEE ARTHUR D. SPRATLIN IR. BROOKS R. BUCHANAN F. BARNEY ROBINSON III L LEE TYNER, JR DANIEL P JORDAN III JOHN J. HEALY III J. WILBOURN VISE LOUIS H WATSON IR JOHN ADAM CRAWFORD JR TAMMY L. BARHAM ROBERT G BARNETT COUNSEL ROBERT C. CANNADA PHINEAS STEVENS GEORGE H. BUTLER DAN McCULLEN OF COUNSEL GEO BUTLER (1948) J. MORGAN STEVENS (1951) CHAS B SNOW (1960)

JUNIOR O'MARA (1986)

Writer's Direct Number (601) 949-4534

JohnCrawford@BSOSC.com

Mr. Barry Royals, Chief
Surface Water Division
Office of Pollution Control
Mississippi Department of Environmental Quality
P. O. Box 10385
Jackson, MS 39289-0385



RE: Hercules, Incorporated NPDES/Industrial Wastewater Discharge

Dear Barry:

When we concluded our meeting on February 12, 1997, Hercules agreed to provide your Division with a status report within two weeks.

Although we could not make connection by telephone on February 26, 1997, I was able to leave a voice mail status report for both you and Jerry Cain. As indicated in our earlier status report, Hercules has scheduled a meeting with the City of Hattiesburg on Tuesday, March 18, 1997, to discuss options which may exist relating to the City of Hattiesburg publicly owned treatment works. Gerald Burch and Charlie Jordan of Hercules will be present for that meeting.

We will provide you with a report immediately following the March 18, 1997, meeting. Since Hercules is in the process of analyzing other aspects of its NPDES discharge, it will be most helpful if we can obtain copies of the EPA water quality study and copies of the analytical results of sampling, both of which were discussed at our February 12, 1997, meeting.

It will be most helpful if either you or Jerry Cain could give me a call to let me know if copies of the reports will be made available to us. As indicated above,

Mr. Barry Royals, Chief March 5, 1997 Page 2

Hercules will provide you with a report soon after the March 18, 1997, conference with the City of Hattiesburg.

Very truly yours,

BUTLER, SNOW, O'MARA, STEVENS & CANNADA, PLLC

John A. Crawford

JAC/an 211S/Royals3.ltr

cc: Mr. Charlie Jordan





STATE OF MISSISSIPPI

DEPARTMENT OF ENVIRONMENTAL QUALITY

JAMES I. PALMER, JR.

EXECUTIVE DIRECTOR

March 3, 1997

Charles Jordan, Environmental Manager Hercules Incorporated 613 West 7th Street P. O. Box 10385 Hattiesburg, Mississippi 39209

Dear Mr. Jordan:

Re: EPA Water Quality Study Bowie River

Enclosed is a study performed by E.P.A. on the back waters of the Bowie River. If you have any questions, please do not hesitate to contact me at 961-5171.

Sincerely,

Charles Cook, P.E.

Industrial NPDES Section

Charles Cook

CEC:dht Enclosure





Hercules Incorporated 613 West 7th Street P.O. Box 1937 Hattiesburg, MS 39403-1937 (601) 545-3450 Fax: (601) 584-3226

February 19, 1997

Certified Mail - Return Receipt Requested For Lot Z 079 760 419

Becky L. Ornelas Office of Pollution Control P. O. Box 10385 Jackson, MS 39289-0385

Dear Becky:

Following your 2/18/97 visit, please find the additional information.

Attached is an 11/20/1996 certified letter addressing the Phenol analysis in question. Also attached is a corrected DMR to reflect this. Please excuse any inconvenience this may have caused.

If I can answer any additional questions, call me at 601-545-3450, Ext. 360.

Very truly yours,

Charles Jordan

Environmental Supervisor

CJ:nb



CHEMICAL SPECIALTIES

February 17, 1997

Hercules Incorporated 613 West 7th Street P.O. Box 1937 Hattiesburg, MS 39403-1937 (601) 545-3450 Fax: (601) 584-3226

Certified Mail - Return Receipt Requested # Z 079760358

Robert C. Arledge, Esq. Schwartz & Associate, P.A. P. O. Box 3949 Jackson, MS 39207

Re: Mrs. Willie M. Ashford

Dear Mr. Arledge:

I am writing in response to your letter of December 10, 1996.

I would like to provide you with additional information regarding the history of Hercules' attempts to identify and help resolve Mrs. Ashford's concerns. I have personally visited her house several times, as have other Hercules plant employees, in an attempt to address her concerns. We are very sympathetic to Mrs. Ashford's situation and are sorry that we cannot provide easy solutions. We have no information that would lead us to believe that any unpleasant odor that she may have smelled coming from Hercules could have been caused by any substance that can endanger her health.

Our first involvement with Mrs. Ashford was on September 9, 1996, when she left a message on the answering machine of Mr. Robert Jones, who is an employee at the Hattiesburg plant. Mr. Jones met with Mrs. Ashford on Tuesday, September 10, to hear her concerns first hand. At the time he was at her home, no odor could be detected by either Mr. Jones or Mrs. Ashford. When Mrs. Ashford contacted Mr. Jones again on the evening of September 11, again complaining of an odor, Mr. Jones, Mr. Charles Jordan, and I visited Mrs. Ashford that evening.

Based on the times Mrs. Ashford said that she smelled an odor, the likely cause was the routine aeration of our wastewater tank. If so, such odors, while unpleasant, would not contain harmful levels of any harmful chemicals based on our knowledge of plant operations. Because of her concern, previously scheduled maintenance of the tank was accelerated. This tank was emptied and taken out of service on September 12. We returned to Mrs. Ashford's house and told her about these actions on September 15. Repairs have since been completed and the tank returned to service on February 12, 1997.

Robert C. Arledge, Esq. Schwartz & Associate, P.A. February 17, 1997 Page 2

I received no other contact from Mrs. Ashford until October 30, 1996. On October 30, she said that the lingering smell from the September event was so bad she could not stay in her home. When Mr. Jones and I arrived, we could not smell what she was complaining about. She stated that the lingering smell had been so bad she had not been living in the house since October 17. She asked us to pay to have her house cleaned and to purchase an air purifying machine. I indicated that because I could not identify anything from Hercules that was causing an odor she continued to smell, I was not in a position to authorize these expenditures on her behalf.

On November 5, 1996, I confirmed this to her in writing. I attach a copy of this letter for your information. There have been no complaints from Mrs. Ashford since my last letter.

It is certainly the desire of Hercules to be a good neighbor to the citizens of this area. Hercules has strived to do so for the many years it has operated in the Hattiesburg area. Hercules plans to continue this policy.

We certainly ask for any additional information you or your client may have, and we are willing to discuss this matter with you, your client, or both of you. We are prepared to have our corporate Medical Director, Dr. Thomas F. Weir, correspond with Mrs. Ashford's physician if an offending material or chemical can be identified and correlated to your client's complaints and symptoms.

Please give this matter further consideration and let us hear from you.

Very truly yours,

Gerald D. Burch Plant Manager

GDB/vrf

Attachment: Letter of November 5, 1996

cc: Dorrance Aultman, Esq. - Aultman, Tyner, McNeese, Ruffin & Laird, Ltd.

bcc: Ronald Tarlton, Plant Manager, Zeon Chemicals Mississippi Inc.

Charles S. Jordan, Environmental Coordinator, Hercules Incorporated Robert E. Jones, Employee Relations Manager, Hercules Incorporated







Forrest

Hercules Incorporated 613 West 7th Street P.O. Box 1937 Hattiesburg, MS 39403-1937 (601) 545-3450

(601) 545-3450 Fax: (601) 584-3226

February 14, 1997

<u>CERTIFIED MAIL - RETURN RECEIPT REQUESTED</u> <u>Z 079 760 418</u>

Mr. Charles Cook Bureau of Pollution Control P. O. Box 10385 Jackson, MS 39209

Dear Mr. Cook:

Following our previous phone conversation, please find the following information for NPDES compliance monitoring in January 1997.

On 1/14/97 we experienced a Phenol excursion which we are again unresolved as to the cause of this excursion. Please reference our previous 11/20/96 letter. We did not produce any phenolic resin in January 1997. As previously stated, we believe our effluent turbidity does interfere with the analysis. This is supported by high solids on the date in question. The high solids were the result of our maintenance work/cleaning of our equalization tank which was put back in service the second week in February.

	TSS (lbs/	/day)	Phenol (lbs/day)	
<u>Date</u>	<u>Actual</u>	<u>Limit</u>	Actual	<u>Limit</u>
1/14/97	1,752	1,648	8.4	4.9

If I can answer any questions, please call me at 601-545-3450, Ext. 360.

Sincerely,

Charles Jordan

Environmental Supervisor

CJ/nb

cc: G. D. Burch



Hercules Incorporated 613 West 7th Street P.O. Box 1937 Hattiesburg, MS 39403-1937 (601) 545-3450 Fax: (601) 584-3226

February 14, 1997



CERTIFIED MAIL - RETURN RECEIPT REQUESTED

No. Z 079 760 411

Mr. Charles Cook
Office of Pollution Control
P. O. Box 10385
Jackson, MS 39289-0385

Dear Mr. Cook:

Attached is our EPA Discharge Monitoring Report for January 1997.

Very truly yours,

Charles Jordan

Environmental Coordinator

CSJ/nb

Attachment



STATE OF MISSISSIPPI

DEPARTMENT OF ENVIRONMENTAL QUALITY

JAMES I. PALMER, JR.

EXECUTIVE DIRECTOR

February 4, 1997

Mr. Gerald Burch Plant Manager Hercules, Inc. P.O. Box 1937 Hattiesburg, MS 39401-1937

FILE COPY

Dear Mr. Burch:

Re: Hercules, Inc.

Forrest County-Hattiesburg Compliance Inspection Report NPDES Permit No. MS0001830

Enclosed is a copy of the NPDES Compliance Monitoring Inspection Report and sampling that was performed at Hercules, Inc. on October 22, 1996. The results of this inspection should be used by you as a guide for complying with requirements and limitations as stated by your NPDES permit. The sampling results indicate that the effluent was in compliance with your NPDES permit limits.

If you have any questions concerning this matter, please contact me at 961-5171.

Respectfully,

Becky Ornelas

Industrial NPDES Section

Enclosures

cc: Mr. Arthur Collins, EPA (w/ enclosures)

CRO

Mr. Paul Zetterholm (w/ enclosures)





January 29, 1997

Hercules Incorporated 613 West 7th Street P.O. Box 1937 Hattiesburg, MS 39403-1937 (601) 545-3450 Fax: (601) 584-3226

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

No. Z 079 760 410

Mr. Charles Cook Office of Pollution Control P. O. Box 10385

Jackson, MS 39289-0385

Correct

Dear Mr. Cook:

Following our 1/28/97 phone conversation, the purpose of this letter is to document the following rainfall events.

On 1/8/97 and 1/27/97 we experienced approximately 2 inches of rainfall. As a result of this excessive amount of rainfall over a short time period, coupled with the cleaning of our equalization tank, we estimate the following amount of primary wastewater bypassing secondary treatment in order to prevent basin overflow. Also on 1/27/97 because of equipment malfunction, pump failure, we overflowed our No. 5 Lift Station for approximately 30 minutes.

			TOC	
<u>ITEM</u>	MGD	<u>mg/l</u>	lbs/day	Permit limit
1/8/97 (1,0	80 gpm x 100 minutes)			
Bypass	0.11	101		
Outfall 001	1.29	196		
Total	1.40			3,800
1/27/97 (1,08	0 ppm x 80 minutes)			
Bypass	0.09	180	135	
Outfall 001	1.23	120	1,231	
Total	1.32		1,366	3,800

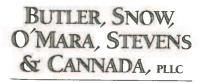
If I can answer any additional questions, please call me at 601-545-3450, Ext. 360.

Very truly yours,

Charles Jordan

Environmental Coordinator

CC: G. D. Burch, Plant Manager



ATTORNEYS AT LAW

17TH FLOOR
DEPOSIT GUARANTY PLAZA
210 EAST CAPITOL STREET
JACKSON, MISSISSIPPI 39201
POST OFFICE BOX 22567
JACKSON, MISSISSIPPI 39225-2567
(601) 948-5711
FACSIMILE: (601) 949-4555

HAROLD D MILLER, IR LAWRENCE J FRANCK C FUGENE MCROBERTS, JR. IOHN A CRAWFORD D CARL BLACK JR LAUCH M MAGRUDER IR HUGH C MONTGOMERY IR JAMES W O'MARA W SCOTT WELCH III JAV A TRAVIS III LEE DAVIS THAMES CHARLES I BROCATO KENNETH W BARTON CHARLES F JOHNSON II STEPHEN W ROSENBLA IAMES S. OVERSTREET, R. HERBERT C FHRHARDT CHRISTY D. IONES DON B. CANNADA PHILB ABERNETHY WIFLGENE MAGEE THOMAS E WILLIAMS EDWARD A WILMFSHERR R. BARRY CANNADA

Hereules Chem. Co. Forest Co.

JOHN C HENEGAN ROBERT A MULER J CARTER THOMPSON JR DANIEL G. HISE JEFFREY A WALKER PAUL N. DAVIS PAUL VARNER 1 STEVENSON RAY E MARCUS WIGGS III JAMIE PLANCK MARTIN PAULA GRAVES ARDELEAN I ESLIE JOYNER BOBO ANN FORTENBERRY CORSO O KENDALL MOORE ROBERT M FREY GILBERT C VAN LOON THOMAS A WEBB CAMILLE HENICK EVANS RONALD G TAYLOR I COLLINS WOLNER IR DONNA BROWN JACOBS SELBY A IRELAND WILLIAM M GAGE

STEPHANIEM RIPPEE ARTHUR D. SPRATLIN, JR. BROOKS R. BUCHANA F BARNEY ROBINSON III L LEE TYNER, JR DANIFL P. JORDAN III JOHN J. HEALY III J WILBOURN VISE LOUIS H WATSON IR JOHN AD AM CRAWFORD JR TAMMY L BARHAM ROBERT G BARNETT COUNSEL. ROBERT C CANNADA PHINEAS STEVENS GEORGF H BUTLER DAN McCULLEN OF COUNSEL GEO BUTLER (1948) J MORGAN STEVENS (1951) CHAS B SNOW (1960) JUNIOR O'MARA (1986)

January 24, 1997

Writer's Direct Number (601) 949-4534

Mr. Charles Cook, P.E.
Industrial NPDES Section
Mississippi Department of Environmental Quality
Office of Pollution Control
P. O. Box 10385

Jackson, MS 39289-0385

RE: Hercules Incorporated NPDES Permit MS0001830

Dear Mr. Cook:

Hercules Incorporated has received your letter of January 9, 1997 in which you enclose a draft NPDES permit with the request that informal comments be made on or before January 31, 1997.

This letter confirms that we contacted Jerry Cain on related matters and asked for an extension of time until February 14, 1997, within which to make informal comments. Mr. Cain has authorized this extension.

We will appreciate your making a notation in your file with reference to the new due date for informal comments.

Very truly yours,

BUTLER, SNOW, O'MARA, STEVENS & CANNADA, PLLC

John A. Crawford

JAC/an
211S/Cook.ltr

cc: Mr. Jerry Cain

Mr. Charles Jordan



BUTLER, SNOW, O'MARA, STEVENS & CANNADA, PLLC

ATTORNEYS AT LAW

17TH FLOOR DEPOSIT GUARANTY PLAZA 210 EAST CAPITOL STREET JACKSON, MISSISSIPPI 39201 POST OFFICE BOX 22567 JACKSON, MISSISSIPPI 39225-2567 (601) 948-5711 FACSIMILE: (601) 949-4555

HAROLD D. MILLER, IR LAWRENCE J FRANCK C. EUGENE MCROBERTS, JR JOHN 4 CRAWFORD D CARL BLACK, JR LAUCH M. MAGRUDER, JR. HUGH C MONIGOMERY, JR. W SCOTT WELCH III IAV A. TRAVIS III LEE DAVIS FILAMES CHARLES L BROCATO KENNETE W BARTON CHARLES F JOHNSON III STEPHEN W ROST NBLATT JAMESS OVERSTREET, JR. HERBERT C. EHRHARDT CHRISTY D JONES PHILB ABLENETHY W FUGENE MAGEE THOMAS E WILLIAMS LOWARD A WILM SHERR R BARRY CANNIDA

ACEY, IR JOHN CHENIGAN ROBERT A MILLER J. CARTER THOMPSON, IR DANIEL G LISE JEFFREY A. WALKER PAUL N. DAVIS I PAUL VARNER STEVENSON RAY F. MARCUS WIGGS II. JAMIE PLANCK MARIN PALLA GRAVES ARDELLAN LESLIE JOYNER BOBO ANN TORT ENBERRY CORED
O KENDALL MOORE ROBERT M FREY GILBERT C. VAN LOON THOMAS A WEPE CAMILLE HINICK IVANS RONALD G TAYLOR COLLINS WOHNER I DONNA BROWN INCOME SELBY A IRELAND WILLIAM M. GAGE

MICHAEL I MEWILLIAMS STEPHANIEM RIPPLE ARTHUR D SPRATIAN JR BROOKS R BUCHANAN LIARMY ROBINSON III LILE TYNER, IR DANIEL PHORDANIE J W LBOURN VISE JUNADAY CRAWFORD R AVMY L BARHAM BOSERI G BARNETI CLINSFI ROBERT C. CANNADA PLINIAS SIEVENS CLORGE H. BUTLIR OF COUNSEL GEO BUTLER (1948) I MORGAN STEVENS 1951) CIAS B SNOW (1960) er's Direct No. (601) 949-453

Writer's Direct Number

STEVENS & CANNADA, PLLC

January 24, 1997

Mr. Charles Cook, P.E. Industrial NPDES Section Mississippi Department of Environmental Quality Office of Pollution Control P. O. Box 10385 Jackson, MS 39289-0385

Hercules Incorporated NPDES Permit MS0001830

Dear Mr. Cook:

Hercules Incorporated has received your letter of January 9, 1997 in which you enclose a draft NPDES permit with the request that informal comments be made on or before January 31, 1997.

This letter confirms that we contacted Jerry Cain on related matters and asked for an extension of time until February 14, 1997, within which to make informal comments. Mr. Cain has authorized this extension.

We will appreciate your making a notation in your file with reference to the new due date for informal comments.

MARA,

Very truly yours,

John Crawford

JAC/an 211S/Cook.ltr

cc: V Mr. Jerry Cain

Mr. Charles Jordan





Hercules Incorporated 613 West 7th Street P.O. Box 1937 Hattiesburg, MS 39403-1937 (601) 545-3450 Fax: (601) 584-3226

January 21, 1997

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

No. Z 079 760 406

Mr. Charles Cook
Office of Pollution Control
P. O. Box 10385

Jackson, MS 39289-0385

Dear Mr. Cook:

Attached is our EPA Discharge Monitoring Report for December 1996.

Very truly yours,

Charles Jordan

Environmental Coordinator

CSJ/nb

Attachment



file; Forpert Co,

STATE OF MISSISSIPPI

DEPARTMENT OF ENVIRONMENTAL QUALITY

JAMES I. PALMER, JR.

EXECUTIVE DIRECTOR

January 9, 1997

Mr.Charles Jordan, Environmental Coordinator Hercules Incorporated 613 West 7th Street P.O. Box 10385 Hattiesburg, Ms. 39209

Dear Mr. Jordan:

Re: NPDES Permit MSO001830

The Mississippi Pollution Control Permit Board intends to soon issue to the above facility a National Pollutant Discharge Elimination System (NPDES) Permit. The enclosed draft permit and public notice are submitted to you for your review and comment.

It is important that you read and understand the conditions of this permit. Only that waste water which is described in your application and which is included in your permit is legally authorized for surface discharge.

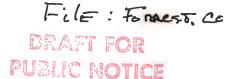
Any comments you may have concerning this draft permit and public notice should be submitted no later than January 31,1997; otherwise, we will presume you have none and proceed with the permitting process.

Sincerely,

Charles Cook, P.E.

Industrial NPDES Section

cc: Nona Yates, OPC Enclosures



DATE: Aug 15/ 1997

State of Mississippi Water Pollution Control PERMIT

TO DISCHARGE WASTEWATER IN ACCORDANCE WITH THE NATIONAL POLLUTANT DISCHARGE ELIMINATION SYSTEM

THIS CERTIFIES THAT

HERCULES INCORPORATED HATTIESBURG, MISSISSIPPI

has been granted permission to discharge wastewater into

001 - unnamed tributary of the Bowie River

in accordance with effluent limitations, monitoring requirements and other conditions set forth in Parts I, II, and III hereof. This permit is issued in accordance with the provisions of the Mississippi Water Pollution Control Law (Section 49-17-1 et seq., Mississippi Code of 1972), and the regulations and standards adopted and promulgated thereunder, and under authority granted pursuant to Section 402(b) of the Federal Water Pollution Control Act.

MISSISSIPPI ENVIRONMENTAL QUALITY PERMIT BOARD

	AUTHORIZE	D S	IGNATURE	
MISSISSIPPI	DEPARTMENT	OF	ENVIRONMENTAL	QUALITY

Issued:

Permit No. MS0001830

Expires: September 16, 2002

A. EFFLUENT LIMITATIONS AND MONITORING REQUIREMENTS

During the period beginning on permit issuance, and lasting until September 16, 2000, the permittee is to discharge from outfall(s) serial number(s) 001 (Process Wastewater and Storm Water). authorized . ;

Such discharges shall be limited and monitored by the permittee as specified below:

MONITORING REQUIREMENTS	Sample Type	Recorder	24-Hr. Composite 24-Hr. Composite Grab Grab
	Measurement Frequency	Continuous	3 Days/Week 3 Days/Week 1/Month 3 Days/Week 3 Days/Week
	(Specify) Daily Max.	Report	Report Report Report Report
DISCHARGE LIMITATIONS	Other Units (Specify) Monthly Avg. Daily Ma:	Report	Report Report Report Report Report
DISCHARGE	lbs/day) Daily Max.	!	1055(2322) 708(1557) 1372(3019) 450(990) 3(6.6)
	kg/day (lbs/day) Monthly Avg. Daily	1	565 (1244) 255 (561) 915 (2013) 300 (660) 1.5 (3.3)
Parameter		Flow-M'/day (MGD) Biochemical Oxygen	Demand (5-Day) Total Suspended Solids Total Organic Carbon Oil and Grease Phenol

- There shall be no discharge of floating solids or visible foam ${
 m i}_{
 m ln}$ other than trace amounts. 2
- The discharge shall not cause the occurrence of a visible sheen on the surface of the receiving waters. . ო
- the nearest accessible point after final treatment but prior to mixing with the receiving streams. Samples taken in compliance with the monitoring requirements specified above shall be taken at the following location(s): 4.

PART I

A. EFFLUENT LIMITATIONS AND MONITORING REQUIREMENTS

authorized to discharge from outfall(s) serial number(s) 002 (storm Water, Noncontact Cooling Water, and During the period beginning on permit issuance, and lasting until September 16, 2000, the permittee is Outfall 001). .

Such discharges shall be limited and monitored by the permittee as specified below:

LIMITATIONS
DISCHARGE LIN
PARAMETER

MONITORING REQUIREMENTS

Sample Type	ξ () () () ()	Grab
Measurement Frequency	Continuone	3 Days/Week Grab
(Specify) Daily Max.	Report	41(105)
Other Units (Specify) Monthly Avg. Daily Max.	Report	1
kg/day (lbs/day) fonthly Avg. Daily Max.	!	1
kg/day (] Monthly Avg.	i	1
	Flow-M³/day (MGD)	Temperature °C(°F)

- The pH shall not be less than **6.5** standard units nor grater than **9.0** standard units and shall be monitored continuously with a grab sample of the effluent. 2
- There shall be no discharge of floating solids or visible foam in other than trace amounts. 'n
- The discharge shall not cause the occurrence of a visible sheen on the surface of the receiving waters. 4
- location(s): the nearest accessible point after final treatment but prior to mixing with the receiving streams. Samples taken in compliance with the monitoring requirements specified above shall be taken at the following 5
- The ${
 m LC_{50}}$ shall pass at less than or equal to 10.7% of the effluent. . 9

A. EFFLUENT LIMITATIONS AND MONITORING REQUIREMENTS

During the period beginning **September 17, 2000,** and lasting until **September 16, 2002,** the permittee is authorized to discharge from outfall(s) serial number(s) 001 (Process Wastewater).

Such discharges shall be limited and monitored by the permittee as specified below:

Monitoring requirements	Sample Type	Recorder	24-Hr. Composite 24-Hr. Composite 24-Hr. Composite 24-Hr. Composite Grab Grab
	Measurement Frequency	Continuous	3 Days/Week 3 Days/Week 1/Month 3 Days/Week 3 Days/Week
	(Specify) Daily Max.	Report	15 mg/l Report 3 mg/l Report Report 0.3 mg/l
DISCHARGE LIMITATIONS	Other Units (Specify) Monthly Avg. Daily Ma	Report	10 mg/l Report 2 mg/l Report Report 0.102 mg/l
DISCHARGE	.bs/day) Daily Max.	1	53(117) 240(525) 10.6(23.4) 69.1(152.1) 53.1(117) 1.6(3.5)
	kg/day (lbs/day) Monthly Avg. Daily	i	79.54(175.2) 159(350) 7.1(15.6) 103.5(228) 79.5(175) .54(1.19)
Parameter		Flow-M ³ /day (MGD) Biochemical Oxygen	Demand (5-Day) Total Suspended Solids Ammonia Nitrogen (as N) Total Organic Carbon Oil and Grease Phenol

- There shall be no discharge of floating solids or visible foam in other than trace amounts. 2
- The discharge shall not cause the occurrence of a visible sheen on the surface of the receiving waters. 3.
- the nearest accessible point after final treatment but prior to mixing with the receiving streams. Samples taken in compliance with the monitoring requirements specified above shall be taken at the following location(s): 4
- Dissolved Oxygen shall not be below 6 ppm and shall be monitored three days per week. . 2
- These limits shall be complied within three (3) years after permit issuance. 9
- Based on the results, the Aluminum, Boron, Nickel, Selenium, Zinc shall be sampled twice per month for six months. toxicity matrix will be reevaluated and the permit shall be modified accordingly. 7.

PART I

A. EFFLUENT LIMITATIONS AND MONITORING REQUIREMENTS

authorized to discharge from outfall(s) serial number(s) 002 (storm Water, Noncontact Cooling Water and the permittee is During the period beginning September 17, 2000, and lasting until September 16, 2002, Outfall 001). 1.

Such discharges shall be limited and monitored by the permittee as specified below:

PUIREMENTS	Sample Type	Recorder Instantaneous
MONITORING REQUIREMENTS	Measurement Frequency	Continuous 3 Days/Week
	(Specify) Daily Max.	Report 32(90)
DISCHARGE LIMITATIONS	Other Units (Specify) Monthly Avg. Daily Max	Report Report
	kg/day (lbs/day) Monthly Avg. Daily Max.	11
	kg/day (] Monthly Avg.	1 1
Parameter		Flow-M'/day (MGD) Temperature °C(°F)

- The pH shall not be less than **6.5** standard units nor greater than **9.0** standard units and shall be monitored continuously with a grab sample of the effluent. 2
- There shall be no discharge of floating solids or visible foam in other than trace amounts. ო
- The discharge shall not cause the occurrence of a visible sheen on the surface of the receiving waters. 4.
- location(s): the nearest accessible point after final treatment but prior to mixing with the receiving streams. Samples taken in compliance with the monitoring requirements specified above shall be taken at the following 5.
- The I_{25} shall pass at less than or equal to 100% of the effluent 9

B. SCHEDULE OF COMPLIANCE

1. The permittee shall achieve compliance with the effluent limitations specified for discharge in accordance with the following schedule:

Upon permit issuance.

2. Within 14 days after either an interim or final date of compliance specified in Part I.B.1., the permittee shall provide the Permit Board with written notice of his compliance or noncompliance with the requirements or conditions specified to be completed by that date.

Not applicable.

C. DEFINITIONS

- "Monthly average" means the average of "daily discharges" over a calendar month, calculated as the sum of all "daily discharges" measured during a calendar month divided by the number of "daily discharges" measured during the month. The monthly average for fecal coliform bacteria is the geometric mean of "daily discharges" measured during the calendar month. In computing the geometric mean for fecal coliform bacteria, the value one (1) shall be substituted for sample results of zero.
- 2. "Daily discharge" means the "discharge of a pollutant" measured during a calendar day or any 24-hour period that reasonably represents the calendar day for purposes of sampling. For pollutants with limitations expressed in units of mass, the "daily discharge" is calculated as the total mass of the pollutant discharged over the day. For pollutants with limitations expressed in other units of measurements, the "daily average" is calculated as the average measurement of the discharge of the pollutant over the day.
- "Daily maximum" means the highest "daily discharge" over a calendar month.

- 4. "Toxic pollutants" include, but are not limited to: (a) any toxic substance listed in Section 307(a)(1) of the Clean Water Act (CWA), any chemical listed in Section 313(c) of the Superfund Amendments and Reauthorization Act of 1986; and (b) any substance (that is not also a conventional or nonconventional pollutant) for which EPA or the State has published an acute or chronic toxicity criterion.
- 5. "Hazardous substances" are defined in 40 CFR 116.4.

D. MONITORING AND REPORTING

1. Representative Sampling

Samples and measurements taken as required herein shall be representative of the volume and nature of the monitored wastewater.

Reporting

a. Monitoring results obtained during the previous month shall be summarized and reported on a Discharge Monitoring Report Form (EPA No. 3320-1) POSTMARKED NO LATER THAN THE 28TH DAY OF THE MONTH FOLLOWING THE COMPLETED REPORTING PERIOD. THE FIRST REPORT IS DUE ON NOVEMBER 28, 1997. Copies of these, and all other reports required herein, shall be signed in accordance with Chapter One Sections II.C. and II.E. of the Mississippi Wastewater Permit Regulations, and shall be submitted to the Mississippi Environmental Quality Permit Board at the following address.

MISSISSIPPI DEPARTMENT OF ENVIRONMENTAL QUALITY
OFFICE OF POLLUTION CONTROL
P. O. Box 10385
Jackson, Mississippi 39289-0385

- b. If the results for a given sample analysis are such that any parameter (other than fecal coliform) is not detected at or above the minimum level for the test method used, a value of zero will be used for that sample in calculating an arithmetic mean value for the parameter. If the resulting calculated arithmetic mean value for that reporting period is zero, the permittee shall report "NODI = B" on the DMR. For fecal coliform, a value of 1.0 shall be used in calculating the geometric mean. If the resulting fecal coliform mean value is 1.0, the permittee shall report "NODI = B" on the DMR. For each quantitative sample value that is not detectable, the test method used and the minimum level for that method for that parameter shall be attached to and submitted with the DMR. The permittee shall then be considered in compliance with the appropriate effluent limitation and/or reporting requirement.
- c. If the permittee monitors any pollutant as prescribed in the permit more frequently than required by the permit using test procedures approved under 40 CFR Part 136 or, in the case of sludge use or disposal, approved under 40 CFR Part 136 unless otherwise specified in 40 CFR Part 503, or as specified in the permit, the results of this monitoring shall be included in the calculation and reporting of the data submitted in the DMR or sludge reporting form specified by the Permit Board.
- d. Calculations for all limitations which require averaging of measurements shall utilize an arithmetic mean unless otherwise specified by the Permit Board in the permit.

3. Test Procedures

Test procedures for the analysis of pollutants shall conform to regulations published pursuant to Section 304(h) of the Federal Water Pollution Control Act, as amended or alternative procedures approved and/or promulgated by EPA. For those parameters listed in Exhibit D of the Mississippi Wastewater Permit Regulations, the permittee shall use approved methods with minimum quantification levels as sensitive as those found in Exhibit D of the regulations.

4. Recording of Results

For each measurement or sample taken pursuant to the requirements of this permit, the permittee shall maintain records of all information obtained from such monitoring including:

- (a) The exact place, date, and time of sampling;
- (b) The dates the analyses were performed;
- (c) The person(s) who performed the analyses;
- (d) The analytical techniques, procedures or methods used; and
- (e) The results of all required analyses.

5. Records Retention

All records and results of monitoring activities required by this permit, including calibration and maintenance records, shall be retained by the permittee for a minimum of three (3) years, unless otherwise required or extended by the Permit Board, copies of which shall be furnished to the Department upon request.

PART I Page 9 24 Permit No. MS0001830

6. Falsifying Reports

Any permittee who falsifies, tampers with, or knowingly renders inaccurate any monitoring device or method required by the Permit Board to be maintained as a condition in a permit, or who alters or falsifies the results obtained by such devices or methods and/or any written report required by or in response to a permit condition, shall be deemed to have violated a permit condition and shall be subject to the penalties provided for a violation of a permit condition pursuant to Section 49-17-43 of the Code.

PART II

A. MANAGEMENT REQUIREMENTS

1. Facility Expansion and/or Modification

Any facility expansion, production increases, process modifications, changes in discharge volume or location or other changes in operations or conditions of the permittee which may result in a new or increased discharge of waste, shall be reported to the Permit Board by submission of a new application for a permit pursuant to Section II.A. of the Mississippi Wastewater Regulations, or if the discharges does not violate effluent limitations specified in the permit, by submitting to the Permit Board a notice of a new or increased discharge.

2. Duty to Comply 40 CFR 122.41(a)

The permittee must comply with all conditions of this permit. Any permit noncompliance constitutes a violation of the Clean Water Act and is grounds for enforcement action; for permit termination, revocation and reissuance, or modification; or denial of a permit renewal application.

- 3. Noncompliance Notification
 - a. Twenty-Four Hour Reporting
 - (1) The permittee shall report any noncompliance which may endanger health or the environment. Any information shall be provided orally within 24 hours from the time the permittee becomes aware of the circumstances. A written submission shall also be provided within 5 days of the time the permittee becomes aware of the circumstances. The written submission shall contain a description of the noncompliance and its cause; the period of noncompliance, including exact dates and times, and if the noncompliance has not been corrected, the anticipated time it is expected to continue; and steps taken or planned to reduce, eliminate, and/or prevent recurrence of the noncompliance.
 - (2) The following shall be included as information which must be reported within 24 hours under this paragraph.
 - Any unanticipated bypass which exceeds any effluent limitation in the permit.
 - ii. Any upset which exceeds any effluent limitation in the permit.
 - iii. Violation of a maximum daily discharge limitation for any of the pollutants listed by the Permit Board in the permit to be reported within 24 hours.

PART 1
Page 1 of 24
Permit No. MS0001830

(3) The Executive Director may waive the written report on a case-by-case basis for reports under paragraph a. of this section if the oral report has been received within 24 hours.

b. Other Noncompliance

The permittee shall report all instances of noncompliance not reported under paragraph a., at the time monitoring reports are submitted or within 30 days from the end of the month in which the noncompliance occurs. The reports shall contain the information listed in paragraph a.

c. Other Information

Where the permittee becomes aware that it failed to submit any relevant facts in a permit application, or submitted incorrect information in a permit application or in any report to the Permit Board, it shall promptly submit such facts or information.

4. Proper Operation, Maintenance and Replacement

The permittee shall at all times properly operate, maintain, and when necessary, promptly replace all facilities and systems of collection, treatment and control (and related appurtenances) which are installed or used by the permittee to achieve compliance with the conditions of this permit. Proper operation and maintenance includes adequate laboratory controls and appropriate quality assurance procedures. Proper replacement includes maintaining an adequate inventory of replacement equipment and parts for prompt replacement when necessary to maintain continuous collection and treatment of wastewater. This provision requires the operation of back-up or auxiliary facilities or similar systems which are installed by a permittee only when the operation is necessary to achieve compliance with the conditions of the permit.

5. Duty to Mitigate

The permittee shall take all reasonable steps to minimize or prevent any discharge or sludge use or disposal in violation of the permit which has a reasonable likelihood of adversely affecting human health or the environment.

Bypassing

The permittee shall comply with the terms and conditions regarding bypass found in 40 CFR 122.41(m).

PART Page 1 of 24
Permit No. MS0001830

7. Upsets

Permittee shall meet the conditions of 40 CFR 122.41(n) regarding "Upsets" and as follows:

- a. Definition. "Upset" means an exceptional incident in which there is unintentional and temporary noncompliance with technology based permit effluent limitations because of factors beyond the reasonable control of the permittee. An upset does not include noncompliance to the extent caused by operational error, improperly designed treatment facilities, inadequate treatment facilities, lack of preventive maintenance, or careless or improper operation.
- b. Effect of an upset. An upset constitutes an affirmative defense to an action brought for noncompliance with such technology based permit effluent limitations if the requirements of paragraph (c) of this section are met. Any determination made during administrative review of claims that noncompliance was caused by upset, and before an action for noncompliance, shall not constitute final administrative action subject to judicial review.
- c. Conditions necessary for demonstration of upset. A permittee who wishes to establish the affirmative defense of upset shall demonstrate, through properly signed contemporaneous operating logs, or other relevant evidence that:
 - (1) An upset occurred and that the permittee can identify the cause(s) of the upset;
 - (2) The permitted facility was at the time being properly operated; and
 - (3) The permittee submitted notice of the upset as required in 40 CFR 122.41(L)(6)(ii)(B)(24-hour notice of noncompliance).
 - (4) The permittee complied with any remedial measures required under 40 CFR 122.41(d) (Duty to Mitigate).
- d. Burden of proof. In any enforcement proceeding the permittee seeking to establish the occurrence of an upset has the burden of proof.

PART Page 1 of 24
Permit No. MS0001830

8. Removed Substances

Solids, sludges, filter backwash, or other residuals removed in the course of treatment or control of wastewater shall be disposed of in a manner such as to prevent such materials from entering State waters and in a manner consistent with the Mississippi Solid Waste Disposal Act, the Federal Resource Conservation and Recovery Act, and the Mississippi Water Pollution Control Act.

9. Power Failures

If electric power is required, in order to maintain compliance with the conditions and prohibitions of the permit, the permittee shall either:

- a. Provide an alternative power source to operate the wastewater control facilities; or, if such alternative power source is not in existence, and no date for its implementation appears in the permit,
- b. Halt, reduce, or otherwise control production and/or all wastewater flows upon reduction, loss, or failure of the primary source of power to the wastewater control facilities.

B. RESPONSIBILITIES

1. Inspection and Entry

The permittee shall allow any authorized Commission representative to enter the permittee's premises at any reasonable time, to have access to and copy any applicable records, to inspect process facilities, treatment works, monitoring methods or equipment or to take samples, as authorized by Section 49-17-29 of the Code. In the event of investigation during an emergency response action, a reasonable time shall be any time of the day or night. Follow-up investigations subsequent to the conclusion of the emergency event shall be conducted at reasonable times.

2. Transfer of Ownership or Control

This permit is not transferable to any person except after proper notice and approval by the Permit Board. In the event of any change in control or ownership of facilities from which the authorized discharges emanate, the permittee shall notify the Mississippi Environmental Quality Permit Board at least thirty (30) days in advance of the proposed transfer date. The notice should include a written agreement between the existing and new permittees containing a specific date for the transfer of permit responsibility, coverage, and liability.

3. Signatory Requirements 40 CFR 122.41(k)

All applications, reports, or information submitted to the Permit Board shall be signed and certified.

- a. All permit applications shall be signed as follows:
 - (1) For a corporation: by a responsible corporate officer. For the purpose of this Section, a responsible corporate officer means: (1) a president, secretary, treasurer or vice president of the corporation in charge of a principal business function, or any other person who performs similar policy or decision-making function for the corporation, or (2) the manager of one or more manufacturing, production, or operating facilities employing more than 250 persons or having gross annual sales or expenditures exceeding 25 million (in second quarter 1980 dollars), if authority to sign documents has been assigned or delegated to the manager in accordance with corporate procedures.
 - (2) For a partnership or sole proprietorship: by a general partner or the proprietor, respectively; or
 - (3) For a municipality, State, Federal, or other public agency: by either a principal executive officer or ranking elected official.
- b. All reports required by the permit and other information requested by the Permit Board shall be signed by a person described above or by a duly authorized representative of that person. A person is a duly authorized representative only if:
 - (1) The authorization is made in writing by a person described above;
 - (2) The authorization specifies either an individual or a position having responsibility for the overall operation of the regulated facility or activity, such as the position of plant manager, operator of a well or a well field, superintendent, position having overall responsibility for environmental matters for the company. (A duly authorized representative may thus be either a named individual or any individual occupying a named position.); and
 - (3) The written authorization is submitted to the Permit Board.

- c. Changes to authorization. If an authorization under paragraph (b) of this section is no longer accurate because a different individual or position has responsibility for the overall operation of the facility, a new authorization satisfying the requirements of paragraph (b) of this section must be submitted to the Permit Board prior to or together with any reports, information, or applications.
- d. Certification. Any person signing a document under paragraphs (a) or (b) of this section shall make the following certification:

"I certify under penalty of law that this document and all attachments were prepared under the direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations."

4. Availability of Records

Except for data determined to be confidential under the Mississippi Water Pollution Control Law, all reports prepared in accordance with the terms of this permit shall be available for public inspection at the office of the Mississippi Department of Environmental Quality Office of Pollution Control.

- 5. Duty to Provide Information
 - a. The permittee shall furnish to the Permit Board within a reasonable time any relevant information which the Permit Board may request to determine whether cause exists for modifying, revoking and reissuing, or terminating the permit, or to determine compliance with the permit.
- 6. Toxic Pollutants

The permittee shall comply with any toxic effluent standard or prohibition (including any schedule of compliance specified in such effluent standard or prohibition) established under Section 307(a) of the Federal Water Pollution Control Act.

Toxic Pollutants Notification Requirements

The permittee shall comply with the applicable provisions of 40 CFR 122.42.

- 8. Civil and Criminal Liability
 - a. Any person who violates a term, condition or schedule of compliance contained within this permit or the Mississippi Water Pollution Control Law is subject to the actions defined by law.
 - b. Except as provided in permit conditions on "Bypassing" and "Upsets" (Part II, A-6 and 7), nothing in this permit shall be construed to relieve the permittee from civil or criminal penalties for noncompliance.
 - c. It shall not be the defense of the permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit.
- 9. Oil and Hazardous Substance Liability

Nothing in this permit shall be construed to preclude the institution of any legal action or relieve the permittee from any responsibilities, liabilities, or penalties to which the permittee is or may be subject to under Section 311 of the Federal Water Pollution Control Act and applicable provisions under Mississippi Law pertaining to transportation, storage, treatment, or spillage of oil or hazardous substances.

10. Property Rights

The issuance of this permit does not convey any property rights in either real or personal property, or any exclusive privileges, nor does it authorize any injury to private property or any invasion of personal rights, nor any infringement of Federal, State, or local laws or regulations.

11. Severability

The provisions of this permit are severable. If any provision of this permit, or the application of any provision of this permit to any circumstances, is challenged or held invalid, the validity of the remaining permit provisions and/or portions thereof or their application to other persons or sets of circumstances, shall not be affected thereby.

PART Of 24
Permit No. MS0001830

12. Expiration of Permit

At least 180 days prior to the expiration date of this permit pursuant to the State law and regulation, the permittee who wishes to continue to operate under this permit shall submit an application to the Permit Board for reissuance. The Permit Board may grant permission to submit an application later than this, but no later than the expiration date of the permit.

13. Protection of Confidential Information

- a. Pursuant to Miss. Code Ann. § 49-17-39 and 40 CFR 123.41, the Permit Board shall make available to the public all information contained on any form and all public comments on such information. Effluent data and information concerning air or water quality shall also be made available to the public. Information that is determined by the Commission to be trade secrets shall not be disclosed to the public without prior consent of the source of such information. When a claim of confidentiality is made by a person in accordance with the provisions of Miss. Code Ann. § 49-17-39, a recommendation on the questions of confidentiality shall be made by the Commission and forwarded to the Regional Administrator (or his/her designee) of EPA for his concurrence in such determination of confidentiality.
- b. A copy of a State, UIC, or NPDES permit application, public notice, fact sheet, draft permit and other forms relating thereto, including written public comment and other reports, files and information relating to the application not classified as confidential information by the Commission pursuant to Part II.B.13.a., shall be available for public inspection and copying during normal business hours at the office of the Department in Jackson, Mississippi.
- Upon determination by the Commission that information c. submitted by a permit applicant is entitled to protection against disclosure as trade secrets, the information shall be so labeled and otherwise handled as confidential. Copies of the information and a notice of the Commission's action shall be forwarded to the Regional Administrator (or his/her designee). In making its determination of entitlement to protection as a trade secret, the Commission shall follow the procedure set forth in Miss. Code Ann. § 49-17-39. In the event the Commission denies the claim of confidentiality, the applicant shall have, upon notification thereof, the right to appeal the Commission's determination in the same manner provided for other orders of the Commission. No disclosure, except to EPA, shall be allowed until any appeal from the determination of the Commission is completed.

PART of 24
Permit No. MS0001830

14. Spill Prevention and Best Management Plans

Any permittee which has above ground bulk storage capacity, of more than 1320 gallons or any single container with a capacity greater than 660 gallons, of materials and/or liquids (including but not limited to, all raw, finished and/or waste material) with chronic or acute potential for pollution impact on waters of the State and not subject to Mississippi Hazardous Waste Management Regulations or 40 CFR 112 (Oil Pollution Prevention) regulations shall provide secondary containment as found in 40 CFR 112 or equivalent protective measures such as trenches or waterways which would conduct any tank releases to a permitted treatment system or sufficient equalization or treatment capacity needed to prevent chronic/acute pollution impact.

PART III

A. REOPENER CLAUSE

This permit shall be modified, or alternately, revoked and reissued, to comply with any applicable effluent standard, limitation or storm water regulation issued or approved under Section 301(b)(2)(C), and (D), 304(b)(2), 307(a)(2) and 402(p) of the Federal Water Pollution Control Act if the effluent standard, limitation or regulation so issued or approved:

- 1. Contains different conditions or is otherwise more stringent than any effluent limitation in the permit; or
- 2. Controls any pollutant not limited in the permit.

B. CLOSURE REQUIREMENTS

Should the permittee decide to permanently close and abandon the premises upon which it operates, it shall so notify the Permit Board no later than 90 days prior to doing so. This Closure Plan shall address how and when all manufactured products, by-products, raw materials, stored chemicals, and solid and liquid waste and residues will be removed from the premises so that no potential environmental hazard to the waters of the State will be presented.

C. REQUIREMENTS REGARDING COOLING AND BOILER WATER ADDITIVES

Notification shall be made to the permitting authority in writing not later than sixty (60) days prior to initiating the addition of any chemical product to the cooling water and/or boiler water which is subject to discharge, other than those previously approved and/or used. Such notification should include, but not be limited to:

- 1. Name and composition of the proposed additive,
- 2. Proposed discharge concentration,
- Dosage addition rates,
- 4. Frequency of use,
- 5. EPA registration, if applicable, and
- Aquatic species toxicological data.

Written approval must be received from the permitting authority prior to initiating use.

D. OTHER STANDARD CONDITIONS

A Storm Water Pollution Study shall be submitted six months after permit issuance. The Study shall contain the following elements. rainfall events that cause a bypass of the treatment system shall be identified. Both the intensity and duration of the events shall be listed. The capacity of the system shall be compared to the water generated by a 10-year worst case 24-hour storm. A process storm water minimization plan shall be developed to assess options on diverting flow from plant areas no longer involved in production. In addition, process areas shall be investigated to determine whether berming specific process areas to minimize flow is feasible. A compliance schedule that outlines the steps the facility will take to comply with the upcoming new permit limits shall be submitted within one year of permit issuance. Acute biomonitoring shall be performed for the first three years of the permit (refer to page 20). Chronic biomonitoring shall be conducted for the last two years of permit issuance (refer to page 22).

E. ACUTE BIOASSAY REQUIREMENTS

The Water Quality Standards of Mississippi require that all waters be free from substances in concentrations or combinations which are harmful to humans, animals, or aquatic life (State of Mississippi, Water Quality Criteria for Intrastate, Interstate and Coastal Waters, page 3, adopted November 16, 1995). In accordance with such requirements, the permittee is authorized to discharge from outfall 002 only in accordance with the following conditions:

- 1. The permittee shall submit any existing toxicity data for review by the Mississippi Office of Pollution Control within 30 days of the effective date of this permit.
- 2. The permittee shall perform static renewal (tests that exceed 48 hours shall be renewed), definitive (a control and five effluent concentrations) toxicity tests at 25°C in accordance with Methods for Measuring the Acute Toxicity of Effluents to Freshwater and Marine Organisms, Fourth Edition, (EPA-600/4-90/027) or the most recent edition. Acute toxicity tests will be conducted on 24-hour composite samples of effluent, and tests must be initiated within 36-hours of completion of the sampling period.
 - a. If the Mississippi Office of Pollution Control determines the receiving stream is freshwater, the permittee must use both the following test organisms and test durations:
 - (1) Pimephales promelas (≤ 24-hrs.of age) 96 hour
 - (2) <u>Ceriodaphnia</u> <u>dubia</u> 48 hour
 - b. If the Mississippi Office of Pollution Control determines the receiving stream is marine or estuarine, the permittee must use both the following test organisms and test durations:

- (1) Menidia beryllina 96 hour
- (2) Mysidopsis bahia 48 hour
- Dilution water used for these tests shall consist of reagent grade water, defined as distilled or deionized water that does not contain substances which are toxic to the test organisms. For freshwater tests, dilution water shall consist of reagent grade chemicals or mineral water combined to make moderately hard dilution water according to Methods for Measuring the Acute Toxicity of Effluents and Receiving Waters to Freshwater and Marine Organisms, Fourth Edition, (EPA-600/4-90/027) or most recent edition. For estuarine testing, dilution water shall consist of synthetic seawater or hypersaline brine combined to achieve a salinity of 20 parts per thousand according to Methods for Measuring the Acute Toxicity of Effluents and Receiving Waters to Freshwater and Marine Organisms, Fourth Edition, (EPA-600/4-90/027) or most recent edition*. These dilution waters will be deemed acceptable if the survival of the control organisms in the toxicity tests is 90% or greater.
- d. A standard reference toxicant quality assurance test (acute) shall be conducted concurrently with the effluent tests using both species used in the toxicity tests. Alternatively, if a lab conducts monthly QA/QC reference toxicant tests for both species as part of their SOP, these results may be submitted in lieu of the above mentioned concurrent tests. In either case the reference toxicant test results must be submitted in the final report as well as on the Mississippi Office of Pollution Control NPDES Whole Effluent Toxicity Testing Report Form.
- The permittee shall conduct the first series of tests specified in Section 2 above within 90 days of the issuance of the permit. tests shall be conducted quarterly thereafter for twelve (12) consecutive months, provided that the acute LC_{50} is greater than or equal to 10.7%. After the first year of testing, the frequency of monitoring will be reduced to once per six months for the life of the permit. Sampling shall be timed to cover the seasonal extremes of the year (hot-dry and cold-wet). The results of these acute toxicity tests shall be reported to the Mississippi Environmental Quality Permit Board on the next quarterly discharge monitoring report. Final acute toxicity test results shall be in report form as outlined in Methods for Measuring the Acute Toxicity of Effluents to Freshwater and Marine Organisms, Fourth Edition, (EPA-600/4-90/027) or most recent edition. Along with this report, the permittee must submit a completed Mississippi Office of Pollution Control NPDES Whole Effluent Toxicity Testing Report Form within two weeks following test completion.
- 4. If either toxicity test results in an LC₅₀ value of less than 10.7%, the permittee shall initiate a second toxicity test within 2 weeks after the completion of the first toxicity test using the organism(s) that failed. The LC₅₀ determinations from these tests shall be reported to the Mississippi Environmental Quality Permit Board within two weeks after completion the test.

5. In the event that the results of any toxicity test reveals that the LC₅₀ of the permittee's effluent is less than 10.7%, then this finding will constitute a violation of Part I of this permit. In the event the permittee passes the second toxicity test, the permittee shall resume testing in accordance with the testing schedule set forth in the permit. In the event the permittee fails the second WET test, the permittee shall submit a Toxicity Reduction Evaluation Plan (TREP) within 45 days following completion of the follow-up tests to reduce the toxicity of the effluent to safe levels. The first phase of the TREP shall include monitoring to characterize the toxicity of the effluent.

In addition to the specific conditions of this permit, the permittee shall comply with all applicable conditions of 40 CFR 122.7 and 40 CFR 122.61 (06-03-93).

¹Safe levels will be determined by the Mississippi Pollution Control Permit Board.

*Contact the Mississippi Office of Pollution Control Laboratory for information on most recent edition(s) of methods manual.

F. CHRONIC BIOASSAY REQUIREMENTS

The Water Quality Standards of Mississippi require that all waters be free from substances in concentrations or combinations which are harmful to humans, animals, or aquatic life (State of Mississippi, Water Quality Criteria for Intrastate and Coastal Waters, Section II.4., Minimum Conditions Applicable to All Waters, page 3, adopted November 16, 1995). In accordance with such requirements, the permittee is authorized to discharge from outfall(s) 002 only in accordance with the following conditions:

- 1. The permittee shall submit any existing toxicity data for review by the Mississippi Office of Pollution Control within 30 days of the effective date of this permit.
- 2. The permittee shall perform 7-day chronic, static renewal, definitive (a control and five effluent concentrations) WET tests in accordance with Short-Term Methods for Estimating the Chronic Toxicity of Effluents and Receiving Waters to Freshwater Organisms, (EPA/600/4-89/001) or Short-Term Methods for Estimating the Chronic Toxicity of Effluents and Receiving Waters to Marine and Estuarine Organisms, (EPA/600/4-91/003) or the most recent edition.
 - a. Dilution water used for these tests shall consist of reagent grade water, defined as distilled or deionized water that does not contain substances which are toxic to the test organisms. For freshwater tests, dilution water shall consist of reagent grade chemicals or mineral water combined to make moderately hard dilution water according to Short-Term Methods for Estimating the Chronic Toxicity of Effluents and Receiving Waters to Freshwater Organisms (EPA/600/4-89/001) or most recent edition. For estuarine testing, dilution water shall consist of synthetic seawater or

PAR II
Page 3 of 24
Permit No. MS0001830

hypersaline brine combined to achieve a salinity of 20 parts per thousand according to Short-Term Methods for Estimating the Chronic Toxicity of Effluents and Receiving Waters to Marine and Estuarine Organisms (EPA/600/4-91/003) or most recent edition. These dilution waters will be deemed acceptable if the control organisms in the toxicity tests meet the minimum EPA criteria for chronic tests.

- ь. If the Mississippi Office of Pollution Control determines the receiving waters are freshwater, the permittee shall conduct a Ceriodaphnia dubia Survival and Reproduction Test, and a Pimephales promelas Larval Survival and Growth Test on serial dilutions of effluent to determine if the discharge from outfall(s) 002 is chronically toxic. Such testing will determine if the water affects the survival, growth, and reproduction of the test organisms. Static renewal tests will be conducted on three 24-hour composite samples of effluent. The first of these composite samples will be used to set up the tests and for the day 1 and day 2 renewals, the second of these composite samples will be used to renew the tests on days 3 and 4, and the third composite sample will be used to renew the tests on days 5 and 6. Not more than 36 hours will elapse between sampling and the first use of any of the composite samples. The chronic test(s) shall be considered valid only if the acceptability criteria referenced in Short-Term Methods for Estimating the Chronic Toxicity of Effluents and Receiving Waters to Freshwater Organisms, (EPA/600/4-89/001), or the most recent edition, are met. All data shall be statistically analyzed according to the referenced manual.
- If the Mississippi Office of Pollution Control determines that the receiving water is estuarine, the permittee shall conduct a Menidia beryllina Larval Survival and Growth Test and a Mysidopsis bahia Survival, Growth, and Fecundity Test on serial dilutions of effluent to determine if the discharge from outfall(s) 002 is chronically toxic. Such testing will determine if the water affects the survival, growth, and fecundity of the test organisms. Static renewal tests will be conducted on three 24-hour composite samples of effluent. The first of these composite samples will be used to set up the tests and for the day 1 and day 2 renewals, the second of these composite samples will be used to renew the tests on days 3 and 4, and the third composite sample will be used to renew the tests on days 5 and 6. Not more than 36 hours will elapse between sampling and the first use of any of the composite samples. The chronic test(s) shall be considered valid only if the acceptability criteria referenced in Short-Term Methods for Estimating the Chronic Toxicity of Effluents and Receiving Waters to Marine and Estuarine Organisms, (EPA/600/4-87/028) or most recent edition are met. All test data shall be statistically analyzed according to the referenced manual.
- d. A standard reference toxicant quality assurance test (chronic) shall be conducted concurrently with the effluent

tests using both species used in the toxicity tests. Alternatively, if a lab conducts monthly QA/QC reference toxicant tests with both species as part of their SOP, these results may be submitted in lieu of the above mentioned concurrent tests results. In either case, the reference toxicant test results must be submitted with the final report as well as on the Mississippi Office of Pollution Control NPDES Whole Effluent Toxicity Testing Report Form.

- 3. These chronic toxicity tests shall be initiated within 90 days of the date of issuance of the permit to evaluate wastewater toxicity. Such chronic toxicity tests shall be conducted once per quarter for a period of one year following the effective date of the permit. After the first year of monitoring, provided the IC₂₅ is greater than or equal to 100%, the frequency of monitoring will be reduced to once per six months for the life of the permit. Sampling shall be timed to cover the seasonal extremes of the year (hot-dry and cold-wet).
- 4. If any one chronic toxicity test indicates the IC₂₅ is less than 100%, the provisions in Section 6 below shall apply, and the permittee shall conduct another chronic toxicity test(s) with the organism(s) that failed. This follow-up test must be completed within 30 days following completion of the failed test. Final chronic toxicity test results shall be in report form as outlined in Methods for Measuring the Acute Toxicity of Effluents to Freshwater and Marine Organisms, Fourth Edition, (EPA-600/4-90/027) or most recent edition. The permittee must also submit a completed Mississippi Office of Pollution Control NPDES Whole Effluent Toxicity Testing Report Form.
- 5. In the event the permittee passes the additional WET test, the permittee shall resume testing in accordance with the testing schedule set forth in the permit. In the event the permittee fails the second WET test, the permittee shall submit a Toxicity Reduction Evaluation Plan (TREP) within 45 days following completion of the follow-up test in order to reduce the toxicity of the effluent to safe¹ levels². The first phase of the TREP will include increased monitoring to characterize the toxicity of the effluent.
- 6. If the IC_{25} of any test is less than 100%, then the effluent will be considered unacceptably chronically toxic, and this will constitute a violation of Part I of this permit.

¹Safe levels will be determined by the Mississippi Environmental Quality Permit Board.

²In large rivers, lakes, and estuaries the permittee must provide a schematic map showing isopleths of waste concentrations.

In addition to the specific conditions of this permit, the permittee shall comply with all applicable conditions of 40 CFR 122.7 and 40 CFR 122.61 (06-03-93).

*Contact the Mississippi Office of Pollution Control Laboratory for information on most recent edition(s) of methods manual.

PUBLIC NOTICE Mississippi Environmental Quality Permit Board P. O. Box 10385 Jackson, MS 39209 Telephone No. (601) 961-5171

August 15, 1997

Hercules Incorporated, located at 613 West 7th Street P.O.10385 Hattiesburg, Ms. 39209, has applied to the Mississippi Environmental Quality Permit Board for the reissuance of an NPDES Permit to discharge treated chemical process waste water and non-contact coolingwater from a waste water treatment system to a tributary of the Bowie River. The applicant's operation manufacters resins and paper chemicals. One discharge is described in the application.

The environmental impact of this project has been evaluated and the staff of the Permit Board believes that, with proper environmental constraints and limitations on the applicant, this project will operate within all State and Federal environmental laws and standards. Therefore, the staff of the Board has preliminarily decided, based on available information, to recommend to the Board that a permit be issued containing numerous environmental regulatory constraints specifically stated in the draft permit. However, before proceeding further with the staff evaluation, public comments are being solicited. The staff recommendation to the Board, as well as the Board decision, will be made only after a thorough consideration of all public comments.

Persons wishing to comment upon or object to the proposed determinations are invited to submit comments in writing to Jerry Cain at the Permit Board's address shown above, no later than September 15, 1997. All comments received by that date will be considered in the formulation of final determinations regarding the application. A public hearing will be held if the Permit Board finds a significant degree of public interest in the proposed permit.

Additional details about the application and the proposed determination, a sketch showing the location of the discharge, and a copy of the draft permit are available by writing or calling Charles Cook at the Permit Board's address and telephone number shown above. Also, this and other information is available for review and copying during normal business hours at the Southport Center Building located at 2380 Highway 80 West, Jackson, MS.

Please bring the foregoing to the attention of persons whom you know will be interested.





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Please bring the foregoing to the attention of persons whom you know will be interested.

30,800 - Mr. D.

PASTE PROOF HERE

RUBLIC NOTICE Mississippi Environmental Quality Permit Board P.O.Box 10385

P.O.Box 10385
Jackson, MS 39209
Telephone No.(601)961-5171
June 1, 1997
Iercules Incorporated, located at 613 West 7th Street, P.O.Box
10385, Hattlesburg, MS, 39209, has applied to the Mississippl Environmental Quality Permit Board for the reissuance of an NPDES Permit to discharge treated chemical process waste water and non-contact cooling water ed chemical process waste water and non-contact cooling water from a wastewater treatment system to a tributary of the Bowie River. The applicant's operation manufactures resins and paper chemicals. One discharge is described in the application.

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Persons wishing to commercial upon or object to the proposed determinations are invited to submit comments in writing to Jerry Cain at the Permit Board's address shows a beginning to the permit Board's address shows a beginning to the permit Board's shows a beginning to the permit Board's shows a permit beginning to the Jerry Cain at the Permit Board's address shown above, no later than June 30, 1997. All comments received by that date will be considered in the formulation of final determinations regarding the application. A public hearing will be held if the Permit Board finds a significant degree of public interest in the proposed permit.

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Please bring the foregoing to the attention of persons whom you know will be interested.

FORREST COUN Personally appeared before a Notary Public of the City of Hattiesburg, Forre County, Mississippi, 🔼 Clerk for HATTIESBURG AMERICAN, a newspaper published in the City of Hattiest Forrest County, Mississippi who, being duly sv says that the notice, a true copy of which is he annexed, appeared in the issues of said newsp as follows: Date_ Date. Date Number Words Published Times Printer's Fee \$ Making Proof \$ (Signed) Sworn to and subscribed before me the

Notary Dublic

Q 1900

5 1997

CERTIFICATE OF AUTHORITY

Pursuant to the provisions of the State of Mississippi and the United States Environmental Protection Agency environmental regulations, I, Marshall Steinberg, being a principal executive officer of the Corporation of at least the level of Vice President, do hereby certify that I have this day authorized and directed, as my duly authorized representative, the person designated below (being the individual having responsibility for the overall operation of the regulated facility), to complete, sign and submit, in the name and on behalf of the Corporation, all environmental reports or requests for information required by Federal and/or State permit issuing authorities:

Authorized Representative:

D. A. Cox

Acting Plant Manager

Regulated Facility:

Hercules incorporated Hattiesburg, Mississippi

IN WITNESS WHEREOF, I have hereunto affixed my signature on this _2_______, day of _________, 1997.

HERCULES INCORPORATED

Marshall Steinberg, Ph.D

Vice President Health & Environment

STATE OF DELAWARE

COUNTY OF NEW CASTLE

SWORN TO and subscribed before me, a notary public in the County and State aforesaid, this _____ day of ______, 1997.

Notary Public

CHARLENE E. PISER
NOTARY PUBLIC - DELAWARE
My commission expires April 10, 2001

My Commission expires:

DATE: June 1/9)

State of Mississippi Water Pollution Control PERMIT

TO DISCHARGE WASTEWATER IN ACCORDANCE WITH THE NATIONAL POLLUTANT DISCHARGE ELIMINATION SYSTEM

THIS CERTIFIES THAT

HERCULES INCORPORATED
HATTIESBURG, MISSISSIPPI

has been granted permission to discharge wastewater into

001 - unnamed tributary of the Bowie River

in accordance with effluent limitations, monitoring requirements and other conditions set forth in Parts I, II, and III hereof. This permit is issued in accordance with the provisions of the Mississippi Water Pollution Control Law (Section 49-17-1 et seq., Mississippi Code of 1972), and the regulations and standards adopted and promulgated thereunder, and under authority granted pursuant to Section 402(b) of the Federal Water Pollution Control Act.

MISSISSIPPI ENVIRONMENTAL QUALITY PERMIT BOARD

	AUTHORIZE	D S	IGNATURE	
MISSISSIPPI	DEPARTMENT	OF	ENVIRONMENTAL	QUALITY
*				/

Issued:	 Permit	No.	MS0001830
Expires:			

A. EFFLUENT LIMITATIONS AND MONITORING REQUIREMENTS

During the period beginning on permit issuance, and lasting until three years after permit issuance, the permittee is authorized to discharge from outfall(s) serial number(s) 001 (Process Wastewater and Storm Water). 7

Such discharges shall be limited and monitored by the permittee as specified below:

MONITORING REQUIREMENTS	ø.	ler	24-Hr. Composite 24-Hr. Composite 24-Hr. Composite Grab Grab
	Sample Type	Recorder	24-Hr 24-Hr 24-Hr Grab Grab
	Measurement . Frequency	Continuous	3 Days/Week 3 Days/Week 3 Days/Week 3 Days/Week
	(Specify) Daily Max	Report	Report Report Report Report Report
DISCHARGE LIMITATIONS	Other Units (Specify) Monthly Avg. Daily Max.	Report	Report Report Report Report Report
DISCHARGE	(lbs/day) Daily Max.	;	1055 (2322) 708 (1557) 72 1107 (2436) 301 450 (990) 2.2 (4.9)
	kg/day (lbs/day) Monthly Avg. Daily	:	565 (1244) 255 (561) 26 (4755) 300 (660) 1.5 (3.3)
Parameter		Flow-M²/day (MGD) Biochemical Oxygen	Demand (5-Day) 565 (1244) 1055 (2322) Total Suspended Solids 255 (561) 708 (1557) Total Organic Carbon 9/5 796 (4755) 372 4107 (2436) 300 (560) 450 (990) Phenol 1.5 (3.3) 2.2 (4.9)

There shall be no discharge of floating solids or visible foam in other than trace amounts.

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- The discharge shall not cause the occurrence of a visible sheen on the surface of the receiving waters. . M
- Samples taken in compliance with the monitoring requirements specified above shall be taken at the following location(s): the nearest accessible point after final treatment but prior to mixing with the receiving streams. 4.

PART I

A. EFFLUENT LIMITATIONS AND MONITORING REQUIREMENTS

During the period beginning on permit issuance, and lasting until three years after permit issuance, the permittee is authorized to discharge from outfall(s) serial number(s) 002 (Storm Water, Noncontact Cooling Water, and Outfall 001). Η.

Such discharges shall be limited and monitored by the permittee as specified below:

Sample Type	Recorder Grab
Measurement Frequency	Continuous 3 Days/Week
(Specify) Daily Max.	Report 41 (105)
Other Units Monthly Avg.	Report
lbs/day) Daily Max.	1 1
kg/day (1 Monthly Avg.	::
	Flow-M³/day (MGD) Temperature °C(°F)
	day (lbs/day) Other Units (Specify) Measurement Avg. Daily Max. Monthly Avg. Daily Max. Frequency

- The pH shall not be less than 6.5 standard units nor grater than 9.0 standard units and shall be monitored continuously with a grab sample of the effluent. 7
- There shall be no discharge of floating solids or visible foam in other than trace amounts. <u>«</u>
- The discharge shall not cause the occurrence of a visible sheen on the surface of the receiving waters. 4
- Samples taken in compliance with the monitoring requirements specified above shall be taken at the following location(s): the nearest accessible point after final treatment but prior to mixing with the receiving streams. ъ.
- The LC_{50} shall pass at less than or equal to 10.7% of the effluent. 9

Н PART

EFFLUENT LIMITATIONS AND MONITORING REQUIREMENTS Ą.

During the period beginning three years after permit issuance, and lasting until 2002, the permittee is authorized to discharge from outfall(s) serial number(s) 001 (Process Wastewater). . ;

Such discharges shall be limited and monitored by the permittee as specified below:

PARAMETER

MONITORING REQUIREMENTS	Sample Type	Recorder	24-Hr. Composite 24-Hr. Composite 24-Hr. Composite 24-Hr. Composite Grab Grab
	Measurement . Frequency	Continuous	3 Days/Week 3 Days/Week 3 Days/Week //wwdg Bays/Week 3 Days/Week 3 Days/Week
	(Specify) Daily Max.	Report	15 mg/l Report 3 mg/l Report Report 0.3 mg/l
IMITATIONS	Other Units (Specify) Monthly Avg. Daily Ma.	Report	10 mg/l Report 2 mg/l Report Report 0.102 mg/l
DISCHARGE LIMITATIONS	(lbs/day) Daily Max.	:	53(117) 240(525) 10.6(23.4) 44107(2436)/52, 53.1(117) 1.6(3.5)
	kg/day (1 Monthly Avg.	:	79.54(175.2) 159(350) 7.1(15.6) 5796(1855), 69. 79.5(175) 228
Parameter		Flow- M^3/day (MGD) Biochemical Oxygen	Demand (5-Day) Total Suspended Solids 159(350) Total Suspended Solids 159(350) Ammonia Nitrogen (as N) 7.1(15.6) Total Organic Carbon 1035796(DASSM 69,4167(2436)/52,7 Report 79.5(175) 228 Sil and Grease 79.5(175) 228 Phenol .54(1.19) Total Organic Carbon 79.5(175) 228 Total Organic Carbon 79.5(175) 228 Total Organic Carbon 79.5(175) 228 Total Organic Carbon 79.5(175) 238 Total Organic Carbon 79.5(175) 248 Total

- There shall be no discharge of floating solids or visible foam in other than trace amounts
- The discharge shall not cause the occurrence of a visible sheen on the surface of the receiving waters.

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- the nearest accessible point after final treatment but prior to mixing with the receiving streams. Samples taken in compliance with the monitoring requirements specified above shall be taken at the following location(s): 4.
 - Dissolved Oxygen shall not be below 6 ppm and shall be monitored three days per week. 5
- These limits shall be complied within three (3) years after permit issuance. 9
- The $oldsymbol{I}_{25}$ shall pass at less than or equal to 100% of the effluent. 7.
- Based on the results, Aluminum, Boron, Nickel, Selenium, Zinc shall be sampled twice per month for six months. toxicity matrix will be reevaluated and the permit shall be modified accordingly.



A. EFFLUENT LIMITATIONS AND MONITORING REQUIREMENTS

During the period beginning three years after permit issuance, and lasting until 2002, the permittee is authorized to discharge from outfall(s) serial number(s) 002 (Storm Water, Noncontact Cooling Water and ⊣

Such discharges shall be limited and monitored by the permittee as specified below:

UIREMENTS	Sample Type	Recorder Instantaneous
MONITORING REQUIREMENTS	Measurement Frequency	Continuous 3 Days/Week
	(Specify) Daily Max.	Report 32(90)
DISCHARGE LIMITATIONS	Other Units (Specify) Monthly Avg. Daily Max.	Report Report
DISCHARGE	kg/day (lbs/day) Monthly Avg. Daily Max.	: :
	kg/day (] Monthly Avg.	::
FAKAMETER		Flow-M³/day (MGD) Temperature °C(°F)
FAX		Flo Tem

- The pH shall not be less than 6.5 standard units nor greater than 9.0 standard units and shall be monitored continuously with a grab sample of the effluent. α.
- There shall be no discharge of floating solids or visible foam in other than trace amounts. ന
- The discharge shall not cause the occurrence of a visible sheen on the surface of the receiving waters. 4
- location(s): the nearest accessible point after final treatment but prior to mixing with the receiving streams. Samples taken in compliance with the monitoring requirements specified above shall be taken at the following 2





B. SCHEDULE OF COMPLIANCE

The permittee shall achieve compliance with the effluent limitations specified for discharge in accordance with the following schedule:

Upon permit issuance.

Within 14 days after either an interim or final date of compliance specified in Part I.B.1., the permittee shall provide the Permit Board with written notice of his compliance or noncompliance with the requirements or conditions specified to be completed by that date.

Not applicable.

C. DEFINITIONS

- 1. "Monthly average" means the average of "daily discharges" over a calendar month, calculated as the sum of all "daily discharges" measured during a calendar month divided by the number of "daily discharges" measured during the month. The monthly average for fecal coliform bacteria is the geometric mean of "daily discharges" measured during the calendar month. In computing the geometric mean for fecal coliform bacteria, the value one (1) shall be substituted for sample results of zero.
- 2. "Daily discharge" means the "discharge of a pollutant" measured during a calendar day or any 24-hour period that reasonably represents the calendar day for purposes of sampling. For pollutants with limitations expressed in units of mass, the "daily discharge" is calculated as the total mass of the pollutant discharged over the day. For pollutants with limitations expressed in other units of measurements, the "daily average" is calculated as the average measurement of the discharge of the pollutant over the day.
- 3. "Daily maximum" means the highest "daily discharge" over a calendar month.



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- 4. "Toxic pollutants" include, but are not limited to: (a) any toxic substance listed in Section 307(a)(1) of the Clean Water Act (CWA), any chemical listed in Section 313(c) of the Superfund Amendments and Reauthorization Act of 1986; and (b) any substance (that is not also a conventional or nonconventional pollutant) for which EPA or the State has published an acute or chronic toxicity criterion.
- 5. "Hazardous substances" are defined in 40 CFR 116.4.

D. MONITORING AND REPORTING

1. Representative Sampling

Samples and measurements taken as required herein shall be representative of the volume and nature of the monitored wastewater.

2. Reporting

a. Monitoring results obtained during the previous month shall be summarized and reported on a Discharge Monitoring Report Form (EPA No. 3320-1) POSTMARKED NO LATER THAN THE 28TH DAY OF THE MONTH FOLLOWING THE COMPLETED REPORTING PERIOD. THE FIRST REPORT IS DUE ON . Copies of these, and all other reports required herein, shall be signed in accordance with Chapter One Sections II.C. and II.E. of the Mississippi Wastewater Permit Regulations, and shall be submitted to the Mississippi Environmental Quality Permit Board at the following address.

MISSISSIPPI DEPARTMENT OF ENVIRONMENTAL QUALITY
OFFICE OF POLLUTION CONTROL
P. O. Box 10385
Jackson, Mississippi 39289-0385



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- b. If the results for a given sample analysis are such that any parameter (other than fecal coliform) is not detected at or above the minimum level for the test method used, a value of zero will be used for that sample in <u>calculating</u> an arithmetic mean value for the parameter. If the resulting calculated arithmetic mean value for that reporting period is zero, the permittee shall <u>report</u> "NODI = B" on the DMR. For fecal coliform, a value of 1.0 shall be used in <u>calculating</u> the geometric mean. If the resulting fecal coliform mean value is 1.0, the permittee shall <u>report</u> "NODI = B" on the DMR. For each quantitative sample value that is not detectable, the test method used and the minimum level for that method for that parameter shall be attached to and submitted with the DMR. The permittee shall then be considered in compliance with the appropriate effluent limitation and/or reporting requirement.
- c. If the permittee monitors any pollutant as prescribed in the permit more frequently than required by the permit using test procedures approved under 40 CFR Part 136 or, in the case of sludge use or disposal, approved under 40 CFR Part 136 unless otherwise specified in 40 CFR Part 503, or as specified in the permit, the results of this monitoring shall be included in the calculation and reporting of the data submitted in the DMR or sludge reporting form specified by the Permit Board.
- d. Calculations for all limitations which require averaging of measurements shall utilize an arithmetic mean unless otherwise specified by the Permit Board in the permit.

3. Test Procedures

Test procedures for the analysis of pollutants shall conform to regulations published pursuant to Section 304(h) of the Federal Water Pollution Control Act, as amended or alternative procedures approved and/or promulgated by EPA. For those parameters listed in Exhibit D of the Mississippi Wastewater Permit Regulations, the permittee shall use approved methods with minimum quantification levels as sensitive as those found in Exhibit D of the regulations.

4. Recording of Results

For each measurement or sample taken pursuant to the requirements of this permit, the permittee shall maintain records of all information obtained from such monitoring including:

- (a) The exact place, date, and time of sampling;
- (b) The dates the analyses were performed;
- (c) The person(s) who performed the analyses;
- (d) The analytical techniques, procedures or methods used; and
- (e) The results of all required analyses.

5. Records Retention

All records and results of monitoring activities required by this permit, including calibration and maintenance records, shall be retained by the permittee for a minimum of three (3) years, unless otherwise required or extended by the Permit Board, copies of which shall be furnished to the Department upon request.



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6. Falsifying Reports

Any permittee who falsifies, tampers with, or knowingly renders inaccurate any monitoring device or method required by the Permit Board to be maintained as a condition in a permit, or who alters or falsifies the results obtained by such devices or methods and/or any written report required by or in response to a permit condition, shall be deemed to have violated a permit condition and shall be subject to the penalties provided for a violation of a permit condition pursuant to Section 49-17-43 of the Code.



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PART II

A. MANAGEMENT REQUIREMENTS

1. Facility Expansion and/or Modification

Any facility expansion, production increases, process modifications, changes in discharge volume or location or other changes in operations or conditions of the permittee which may result in a new or increased discharge of waste, shall be reported to the Permit Board by submission of a new application for a permit pursuant to Section II.A. of the Mississippi Wastewater Regulations, or if the discharges does not violate effluent limitations specified in the permit, by submitting to the Permit Board a notice of a new or increased discharge.

2. Duty to Comply 40 CFR 122.41(a)

The permittee must comply with all conditions of this permit. Any permit noncompliance constitutes a violation of the Clean Water Act and is grounds for enforcement action; for permit termination, revocation and reissuance, or modification; or denial of a permit renewal application.

- 3. Noncompliance Notification
 - a. Twenty-Four Hour Reporting
 - (1) The permittee shall report any noncompliance which may endanger health or the environment. Any information shall be provided orally within 24 hours from the time the permittee becomes aware of the circumstances. A written submission shall also be provided within 5 days of the time the permittee becomes aware of the circumstances. The written submission shall contain a description of the noncompliance and its cause; the period of noncompliance, including exact dates and times, and if the noncompliance has not been corrected, the anticipated time it is expected to continue; and steps taken or planned to reduce, eliminate, and/or prevent recurrence of the noncompliance.
 - (2) The following shall be included as information which must be reported within 24 hours under this paragraph.
 - i. Any unanticipated bypass which exceeds any effluent limitation in the permit.
 - ii. Any upset which exceeds any effluent limitation in the permit.
 - iii. Violation of a maximum daily discharge limitation for any of the pollutants listed by the Permit Board in the permit to be reported within 24 hours.



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(3) The Executive Director may waive the written report on a case-by-case basis for reports under paragraph a. of this section if the oral report has been received within 24 hours.

b. Other Noncompliance

The permittee shall report all instances of noncompliance not reported under paragraph a., at the time monitoring reports are submitted or within 30 days from the end of the month in which the noncompliance occurs. The reports shall contain the information listed in paragraph a.

c. Other Information

Where the permittee becomes aware that it failed to submit any relevant facts in a permit application, or submitted incorrect information in a permit application or in any report to the Permit Board, it shall promptly submit such facts or information.

4. Proper Operation, Maintenance and Replacement

The permittee shall at all times properly operate, maintain, and when necessary, promptly replace all facilities and systems of collection, treatment and control (and related appurtenances) which are installed or used by the permittee to achieve compliance with the conditions of this permit. Proper operation and maintenance includes adequate laboratory controls and appropriate quality assurance procedures. Proper replacement includes maintaining an adequate inventory of replacement equipment and parts for prompt replacement when necessary to maintain continuous collection and treatment of wastewater. This provision requires the operation of back-up or auxiliary facilities or similar systems which are installed by a permittee only when the operation is necessary to achieve compliance with the conditions of the permit.

5. Duty to Mitigate

The permittee shall take all reasonable steps to minimize or prevent any discharge or sludge use or disposal in violation of the permit which has a reasonable likelihood of adversely affecting human health or the environment.

Bypassing

The permittee shall comply with the terms and conditions regarding bypass found in 40 CFR 122.41(m).



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7. Upsets

Permittee shall meet the conditions of 40 CFR 122.41(n) regarding "Upsets" and as follows:

- a. Definition. "Upset" means an exceptional incident in which there is unintentional and temporary noncompliance with technology based permit effluent limitations because of factors beyond the reasonable control of the permittee. An upset does not include noncompliance to the extent caused by operational error, improperly designed treatment facilities, inadequate treatment facilities, lack of preventive maintenance, or careless or improper operation.
- b. Effect of an upset. An upset constitutes an affirmative defense to an action brought for noncompliance with such technology based permit effluent limitations if the requirements of paragraph (c) of this section are met. Any determination made during administrative review of claims that noncompliance was caused by upset, and before an action for noncompliance, shall not constitute final administrative action subject to judicial review.
- Conditions necessary for demonstration of upset. A permittee who wishes to establish the affirmative defense of upset shall demonstrate, through properly signed contemporaneous operating logs, or other relevant evidence that:
 - (1) An upset occurred and that the permittee can identify the cause(s) of the upset;
 - (2) The permitted facility was at the time being properly operated; and
 - (3) The permittee submitted notice of the upset as required in 40 CFR 122.41(L)(6)(ii)(B)(24-hour notice of noncompliance).
 - (4) The permittee complied with any remedial measures required under 40 CFR 122.41(d) (Duty to Mitigate).
- d. Burden of proof. In any enforcement proceeding the permittee seeking to establish the occurrence of an upset has the burden of proof.



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8. Removed Substances

Solids, sludges, filter backwash, or other residuals removed in the course of treatment or control of wastewater shall be disposed of in a manner such as to prevent such materials from entering State waters and in a manner consistent with the Mississippi Solid Waste Disposal Act, the Federal Resource Conservation and Recovery Act, and the Mississippi Water Pollution Control Act.

9. Power Failures

If electric power is required, in order to maintain compliance with the conditions and prohibitions of the permit, the permittee shall either:

- a. Provide an alternative power source to operate the wastewater control facilities; or, if such alternative power source is not in existence, and no date for its implementation appears in the permit,
- b. Halt, reduce, or otherwise control production and/or all wastewater flows upon reduction, loss, or failure of the primary source of power to the wastewater control facilities.

B. RESPONSIBILITIES

1. Inspection and Entry

The permittee shall allow any authorized Commission representative to enter the permittee's premises at any reasonable time, to have access to and copy any applicable records, to inspect process facilities, treatment works, monitoring methods or equipment or to take samples, as authorized by Section 49-17-29 of the Code. In the event of investigation during an emergency response action, a reasonable time shall be any time of the day or night. Follow-up investigations subsequent to the conclusion of the emergency event shall be conducted at reasonable times.

2. Transfer of Ownership or Control

This permit is not transferable to any person except after proper notice and approval by the Permit Board. In the event of any change in control or ownership of facilities from which the authorized discharges emanate, the permittee shall notify the Mississippi Environmental Quality Permit Board at least thirty (30) days in advance of the proposed transfer date. The notice should include a written agreement between the existing and new permittees containing a specific date for the transfer of permit responsibility, coverage, and liability.



3. Signatory Requirements 40 CFR 122.41(k)

All applications, reports, or information submitted to the Permit Board shall be signed and certified.

- a. All permit applications shall be signed as follows:
 - (1) For a corporation: by a responsible corporate officer. For the purpose of this Section, a responsible corporate officer means: (1) a president, secretary, treasurer or vice president of the corporation in charge of a principal business function, or any other person who performs similar policy or decision-making function for the corporation, or (2) the manager of one or more manufacturing, production, or operating facilities employing more than 250 persons or having gross annual sales or expenditures exceeding 25 million (in second quarter 1980 dollars), if authority to sign documents has been assigned or delegated to the manager in accordance with corporate procedures.
 - (2) For a partnership or sole proprietorship: by a general partner or the proprietor, respectively; or
 - (3) For a municipality, State, Federal, or other public agency: by either a principal executive officer or ranking elected official.
- b. All reports required by the permit and other information requested by the Permit Board shall be signed by a person described above or by a duly authorized representative of that person. A person is a duly authorized representative only if:
 - (1) The authorization is made in writing by a person described above;
 - (2) The authorization specifies either an individual or a position having responsibility for the overall operation of the regulated facility or activity, such as the position of plant manager, operator of a well or a well field, superintendent, position having overall responsibility for environmental matters for the company. (A duly authorized representative may thus be either a named individual or any individual occupying a named position.); and
 - (3) The written authorization is submitted to the Permit Board.



- c. Changes to authorization. If an authorization under paragraph (b) of this section is no longer accurate because a different individual or position has responsibility for the overall operation of the facility, a new authorization satisfying the requirements of paragraph (b) of this section must be submitted to the Permit Board prior to or together with any reports, information, or applications.
- d. Certification. Any person signing a document under paragraphs (a) or (b) of this section shall make the following certification:

"I certify under penalty of law that this document and all attachments were prepared under the direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations."

Availability of Records

Except for data determined to be confidential under the Mississippi Water Pollution Control Law, all reports prepared in accordance with the terms of this permit shall be available for public inspection at the office of the Mississippi Department of Environmental Quality Office of Pollution Control.

- 5. Duty to Provide Information
 - a. The permittee shall furnish to the Permit Board within a reasonable time any relevant information which the Permit Board may request to determine whether cause exists for modifying, revoking and reissuing, or terminating the permit, or to determine compliance with the permit.
- 6. Toxic Pollutants

The permittee shall comply with any toxic effluent standard or prohibition (including any schedule of compliance specified in such effluent standard or prohibition) established under Section 307(a) of the Federal Water Pollution Control Act.



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7. Toxic Pollutants Notification Requirements

The permittee shall comply with the applicable provisions of 40 CFR 122.42.

- 8. Civil and Criminal Liability
 - a. Any person who violates a term, condition or schedule of compliance contained within this permit or the Mississippi Water Pollution Control Law is subject to the actions defined by law.
 - b. Except as provided in permit conditions on "Bypassing" and "Upsets" (Part II, A-6 and 7), nothing in this permit shall be construed to relieve the permittee from civil or criminal penalties for noncompliance.
 - c. It shall not be the defense of the permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit.
- 9. Oil and Hazardous Substance Liability

Nothing in this permit shall be construed to preclude the institution of any legal action or relieve the permittee from any responsibilities, liabilities, or penalties to which the permittee is or may be subject to under Section 311 of the Federal Water Pollution Control Act and applicable provisions under Mississippi Law pertaining to transportation, storage, treatment, or spillage of oil or hazardous substances.

10. Property Rights

The issuance of this permit does not convey any property rights in either real or personal property, or any exclusive privileges, nor does it authorize any injury to private property or any invasion of personal rights, nor any infringement of Federal, State, or local laws or regulations.

11. Severability

The provisions of this permit are severable. If any provision of this permit, or the application of any provision of this permit to any circumstances, is challenged or held invalid, the validity of the remaining permit provisions and/or portions thereof or their application to other persons or sets of circumstances, shall not be affected thereby.



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12. Expiration of Permit

At least 180 days prior to the expiration date of this permit pursuant to the State law and regulation, the permittee who wishes to continue to operate under this permit shall submit an application to the Permit Board for reissuance. The Permit Board may grant permission to submit an application later than this, but no later than the expiration date of the permit.

13. Protection of Confidential Information

- a. Pursuant to Miss. Code Ann. § 49-17-39 and 40 CFR 123.41, the Permit Board shall make available to the public all information contained on any form and all public comments on such information. Effluent data and information concerning air or water quality shall also be made available to the public. Information that is determined by the Commission to be trade secrets shall not be disclosed to the public without prior consent of the source of such information. When a claim of confidentiality is made by a person in accordance with the provisions of Miss. Code Ann. § 49-17-39, a recommendation on the questions of confidentiality shall be made by the Commission and forwarded to the Regional Administrator (or his/her designee) of EPA for his concurrence in such determination of confidentiality.
- b. A copy of a State, UIC, or NPDES permit application, public notice, fact sheet, draft permit and other forms relating thereto, including written public comment and other reports, files and information relating to the application not classified as confidential information by the Commission pursuant to Part II.B.13.a., shall be available for public inspection and copying during normal business hours at the office of the Department in Jackson, Mississippi.
- C. Upon determination by the Commission that information submitted by a permit applicant is entitled to protection against disclosure as trade secrets, the information shall be so labeled and otherwise handled as confidential. Copies of the information and a notice of the Commission's action shall be forwarded to the Regional Administrator (or his/her designee). In making its determination of entitlement to protection as a trade secret, the Commission shall follow the procedure set forth in Miss. Code Ann. § 49-17-39. In the event the Commission denies the claim of confidentiality, the applicant shall have, upon notification thereof, the right to appeal the Commission's determination in the same manner provided for other orders of the Commission. No disclosure, except to EPA, shall be allowed until any appeal from the determination of the Commission is completed.



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14. Spill Prevention and Best Management Plans

Any permittee which has above ground bulk storage capacity, of more than 1320 gallons or any single container with a capacity greater than 660 gallons, of materials and/or liquids (including but not limited to, all raw, finished and/or waste material) with chronic or acute potential for pollution impact on waters of the State and not subject to Mississippi Hazardous Waste Management Regulations or 40 CFR 112 (Oil Pollution Prevention) regulations shall provide secondary containment as found in 40 CFR 112 or equivalent protective measures such as trenches or waterways which would conduct any tank releases to a permitted treatment system or sufficient equalization or treatment capacity needed to prevent chronic/acute pollution impact.



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PART III

A. REOPENER CLAUSE

This permit shall be modified, or alternately, revoked and reissued, to comply with any applicable effluent standard, limitation or storm water regulation issued or approved under Section 301(b)(2)(C), and (D), 304(b)(2), 307(a)(2) and 402(p) of the Federal Water Pollution Control Act if the effluent standard, limitation or regulation so issued or approved:

- 1. Contains different conditions or is otherwise more stringent than any effluent limitation in the permit; or
- Controls any pollutant not limited in the permit.

B. CLOSURE REQUIREMENTS

Should the permittee decide to permanently close and abandon the premises upon which it operates, it shall so notify the Permit Board no later than 90 days prior to doing so. This Closure Plan shall address how and when all manufactured products, by-products, raw materials, stored chemicals, and solid and liquid waste and residues will be removed from the premises so that no potential environmental hazard to the waters of the State will be presented.

C. REQUIREMENTS REGARDING COOLING AND BOILER WATER ADDITIVES

Notification shall be made to the permitting authority in writing not later than sixty (60) days prior to initiating the addition of any chemical product to the cooling water and/or boiler water which is subject to discharge, other than those previously approved and/or used. Such notification should include, but not be limited to:

- 1. Name and composition of the proposed additive,
- Proposed discharge concentration,
- 3. Dosage addition rates,
- 4. Frequency of use,
- EPA registration, if applicable, and
- Aquatic species toxicological data.

Written approval must be received from the permitting authority prior to initiating use.

D. OTHER STANDARD CONDITIONS

A Storm Water Pollution Study shall be submitted six months after permit issuance. The Study shall contain the following elements. rainfall events that cause a bypass of the treatment system shall be identified. Both the intensity and duration of the events shall be listed. The capacity of the system shall be compared to the water generated by a 10-year worst case 24-hour storm. A process storm water minimization plan shall be developed to assess options on diverting flow from plant areas no longer involved in production. In addition, process areas shall be investigated to determine whether berming specific process areas to minimize flow is feasible. A compliance schedule that outlines the steps the facility will take to comply with the upcoming new permit limits shall be submitted within one year of permit issuance. Acute biomonitoring shall be performed for the first three years of the permit (refer to page 20). Chronic biomonitoring shall be conducted for the last two years of permit issuance (refer to page 22).



E. ACUTE BIOASSAY REQUIREMENTS

The Water Quality Standards of Mississippi require that all waters be free from substances in concentrations or combinations which are harmful to humans, animals, or aquatic life (State of Mississippi, Water Quality Criteria for Intrastate, Interstate and Coastal Waters, page 3, adopted November 16, 1995). In accordance with such requirements, the permittee is authorized to discharge from outfall 002 only in accordance with the following conditions:

- 1. The permittee shall submit any existing toxicity data for review by the Mississippi Office of Pollution Control within 30 days of the effective date of this permit.
- 2. The permittee shall perform static renewal (tests that exceed 48 hours shall be renewed), definitive (a control and five effluent concentrations) toxicity tests at 25°C in accordance with Methods for Measuring the Acute Toxicity of Effluents to Freshwater and Marine Organisms, Fourth Edition, (EPA-600/4-90/027) or the most recent edition. Acute toxicity tests will be conducted on 24-hour composite samples of effluent, and tests must be initiated within 36-hours of completion of the sampling period.
 - a. If the Mississippi Office of Pollution Control determines the receiving stream is freshwater, the permittee must use both the following test organisms and test durations:
 - (1) Pimephales promelas (< 24-hrs.of age) 96 hour
 - (2) Ceriodaphnia dubia 48 hour
 - b. If the Mississippi Office of Pollution Control determines the receiving stream is marine or estuarine, the permittee must use both the following test organisms and test durations:
 - (1) Menidia beryllina 96 hour
 - (2) Mysidopsis bahia 48 hour
 - Dilution water used for these tests shall consist of reagent grade water, defined as distilled or deionized water that does not contain substances which are toxic to the test organisms. For freshwater tests, dilution water shall consist of reagent grade chemicals or mineral water combined to make moderately hard dilution water according to Methods for Measuring the Acute Toxicity of Effluents and Receiving Waters to Freshwater and Marine Organisms, Fourth Edition, (EPA-600/4-90/027) or most recent edition. For estuarine testing, dilution water shall consist of synthetic seawater or hypersaline brine combined to achieve a salinity of 20 parts per thousand according to Methods for Measuring the Acute Toxicity of Effluents and Receiving Waters to Freshwater and Marine Organisms, Fourth Edition, (EPA-600/4-90/027) or most recent edition. These dilution waters will be deemed acceptable if the survival of the control organisms in the toxicity tests is 90% or greater.
 - d. A standard reference toxicant quality assurance test (acute) shall be conducted concurrently with the effluent tests using both species used in the toxicity tests. Alternatively, if a lab conducts monthly QA/QC reference toxicant tests for both species as part of their SOP, these results may be submitted in lieu of the above mentioned concurrent tests. In either case the reference toxicant test results must be submitted in the final report as well as on the Mississippi Office of Pollution Control NPDES Whole Effluent Toxicity Testing Report Form.



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- If the Mississippi Office of Pollution Control determines that the receiving water is estuarine, the permittee shall conduct a Menidia beryllina Larval Survival and Growth Test and a Mysidopsis bahia Survival, Growth, and Fecundity Test on serial dilutions of effluent to determine if the discharge from outfall(s) 001 is chronically toxic. Such testing will determine if the water affects the survival, growth, and fecundity of the test organisms. Static renewal tests will be conducted on three 24-hour composite samples of effluent. The first of these composite samples will be used to set up the tests and for the day 1 and day 2 renewals, the second of these composite samples will be used to renew the tests on days 3 and 4, and the third composite sample will be used to renew the tests on days 5 and 6. Not more than 36 hours will elapse between sampling and the first use of any of the composite samples. The chronic test(s) shall be considered valid only if the acceptability criteria referenced in Short-Term Methods for Estimating the Chronic Toxicity of Effluents and Receiving Waters to Marine and Estuarine Organisms, (EPA/600/4-87/028) or most recent edition are met. All test data shall be statistically analyzed according to the referenced manual.
- d. A standard reference toxicant quality assurance test (chronic) shall be conducted concurrently with the effluent tests using both species used in the toxicity tests.

 Alternatively, if a lab conducts monthly QA/QC reference toxicant tests with both species as part of their SOP, these results may be submitted in lieu of the above mentioned concurrent tests results. In either case, the reference toxicant test results must be submitted with the final report as well as on the Mississippi Office of Pollution Control NPDES Whole Effluent Toxicity Testing Report Form.
- 3. These chronic toxicity tests shall be initiated within 90 days of the date of issuance of the permit to evaluate wastewater toxicity. Such chronic toxicity tests shall be conducted once per quarter for a period of one year following the effective date of the permit. After the first year of monitoring, provided the IC₂ is greater than or equal to 100%, the frequency of monitoring will be reduced to once per six months for the life of the permit. Sampling shall be timed to cover the seasonal extremes of the year (hot-dry and cold-wet).
- 4. If any one chronic toxicity test indicates the IC₂ is less than 100%, the provisions in Section 6 below shall apply, and the permittee shall conduct another chronic toxicity test(s) with the organism(s) that failed. This follow-up test must be completed within 30 days following completion of the failed test. Final chronic toxicity test results shall be in report form as outlined in Methods for Measuring the Acute Toxicity of Effluents to Freshwater and Marine Organisms, Fourth Edition, (EPA-600/4-90/027) or most recent edition. The permittee must also submit a completed Mississippi Office of Pollution Control NPDES Whole Effluent Toxicity Testing Report Form.
- 5. In the event the permittee passes the additional WET test, the permittee shall resume testing in accordance with the testing schedule set forth in the permit. In the event the permittee fails the second WET test, the permittee shall submit a Toxicity Reduction Evaluation Plan (TREP) within 45 days following completion of the follow-up test in order to reduce the toxicity of the effluent to safe¹ levels². The first phase of the TREP will include increased monitoring to characterize the toxicity of the effluent.



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6. If the IC₂₅ of any test is less than 100%, then the effluent will be considered unacceptably chronically toxic, and this will constitute a violation of Part I of this permit.

¹Safe levels will be determined by the Mississippi Environmental Quality Permit Board.

²In large rivers, lakes, and estuaries the permittee must provide a schematic map showing isopleths of waste concentrations.

In addition to the specific conditions of this permit, the permittee shall comply with all applicable conditions of 40 CFR 122.7 and 40 CFR 122.61 (06-03-93).

*Contact the Mississippi Office of Pollution Control Laboratory for information on most recent edition(s) of methods manual.



PERMIT RATIONALE HERCULES INCORPORATED

HATTIESBURG/FORREST COUNTY
NPDES MS0001830
May 30, 1997

- I. INDUSTRIAL CLASSIFICATION: Manufacture of modified resins, resin solutions and paper chemicals.
- II. GENERAL DESCRIPTION OF WASTEWATER AND DISCHARGE FLOW:
 The outfall consist of combined coolingwater, processwater, and stormwater flow.
- III. DESCRIPTION OF WASTEWATER TREATMENT: Sedimentation, floatation, neutralization, and carbon adsorption.
- IV. RECEIVING WATERS: an unnamed tributary of the Bowie River
- V. APPLICABLE GUIDELINES: 40 CFR Part 454 Gum and Wood Chemical Manufacturing Point Source Category, Subpart C, Woodrosin, Turpentine and Pine Oil., BAT 40 CFR Part 428 Rubber Manufacturing Point Source Category, BAT.
- VI. PERTINENT DATA FROM FORM 2C:

A.Outfall 001:

Parameter	max daily	max 30 day	long term ave
	(lbs/day)	(lbs/day)	(lbs/day)
BOD	1,747	871	445
TOC	1,352	742	448
COD	3,309	-	•
TSS	542	172	126
NH3N	47		_
FLOW	1.94MGD	.96 MGD	.69 MGD
	(mg/l)		
Br.	7.1		
\mathbf{F}_{\bullet}	0.15		
N(ORG)	8.9		
O&G	161		
Sulfate	180		
Sulfide	3		

Cont'd



Cont'd	
Parameter	max daily
	(mg/l)
Sulfite	3.8
Surfactant	0.17
Al.	0.22
Boron	0.22
Fe	0.22
Mo	0.009
Mg	0.07
Sn	0.01
Ni	0.01
Se	0.009
Th	0.018
Zinc	0.04
Phenols	0.03
Toluene	0.235
BB phth-	
alates	0.036
Phenol	0.829

VII. WATER QUALITY CALCULATIONS:

See Attachment I - Chemical Specific Screening.

VIII. CATEGORICAL GUIDELINES CALCULATIONS: 40 CFR Part 454.31 Gum and Wood Chemical Manufacturing Point Source Catergory, (BAT) and 40 CFR 428 Rubber Manufacturing Point Source Catergory (BAT).

A. BOD5

Categorical limits: Gum and Wood Chemical Manufacturing and Rubber Manufacturing

8			(lb/1000 lb.)	production)	lbs/day	lbs/day
Product	<u>lbs/d</u>	40cfr ref.	30day ave	max	avg	max
resins	536,647	454.31	1.1	2.08	590.3	1116
rubber	65,300	428.103	.12	.08	7.8	5.2
misc. paper chem.	645,695	*	1.0	1.86	<u>646</u>	<u>1201</u>
					1244.1	2322.2

*AVE BOD= 598/601,947 = 1.0 (LBS BOD/1000 LBS) MAX BOD= 1121.2/601,947 = 1.86 (LBS BOD/1000 LBS) These BOD5 limits are more stringent than previous limits that were based on higher production rates, i.e. 1631 ave, 3051 max.

The Water Quality Monitoring Branch recommended a BOD limit of 2425 LBS/DAY. The categorical limit is more stringent and will be used .

B. TSSCategorical limits

Product	<u>lbs/d</u>	40 cfr ref	(lb/1000 lb. 30day ave	product) <u>max</u>	lb/day avg	lb/day <u>max</u>
resins	536,647	454.31	0.475	1.38	255	740
rubber misc.	65,300	428.103	0.24	.16	15.7	10.5
paper chem.	645,695	*	0.45	1.25	<u>290</u>	<u>807</u>
CHEIII.					560.7	1557.5

^{*}AVE TSS = 270/601,947 = 0.45 (LBS BOD/1000 LBS) MAX TSS = 750.5/601,947 = 1.25(LBS BOD/1000 LBS)

These limits are more stringent than previous limits that were based on higher production rates i.e. 579 ave, 1648 max.

IX. SUMMARY OF CATEGORICAL GUIDELINES AND WATER QUALITY CALCULATIONS, PRESENT AND PROPOSED EFFLUENT PERMIT LIMITATIONS:

A. Outfall 001: INTERIM LIMITATIONS Average Limitations, (lbs/day):

	Categorical Guidelines	Water Quality	Present Permit	Proposed Permit	<u>Basis</u>
Parameter					
BOD5	1244	2425	1631	1244	CAT
TSS	561	none	579	561	CAT
TOC	none	none	1755	1755	BPJ
O&G	none	none	660	660	BPJ
Phenol	none	3.3	3.3	3.3	WQ





Sur wicenati

Maximum Limitations, (lbs/day):

	Categorical Guidelines	Water Ouality	Present Permit	Proposed Permit	BASIS
Parameter	Guidennes	<u>Vuunty</u>	ACIMIC	1 Cimic	DADIS
BOD5	2322	3638	3051	2322	CAT
TSS	1557	none	1648	1557	CAT
TOC	none	none	3800	2436	BPJ
O&G	none	none	990	990	ВРЈ
Phenol	none	4.9	4.9	4.9	wo wo

X. BASIS FOR PROPOSED EFFLUENT LIMITATIONS AND PERMIT REQUIREMENTS:

1. INTERIM LIMITATIONS

A. BOD5

The interim limitations are based on the categorical limitations.

B. TOC

There are no established limits for TOC, therefore the existing limits will be used factoring in the reduced production as compared to production during the last permit period.i.e.: 935,655 / 1,292,400 (LBS OF PRODUCTS) = $0.72 \cdot 0.72*3800 = 2,436$ LBS/D MAX

0.72*2,500 = 1,755 LBS/D AVE. These limits are being met by current technology, activated carbon filter.

C. Oil & grease

The current mass limit, 660 lbs/d ave , 990 lbs/d max, are less than the 10 ppm limit to prevent an oil sheen. i.e. : 660/(116.3*8.34) = 0.68 ppm

D. Phenol

Phenol limits are established by applying the State water quality limits to the river and estimating the maximum allowable concentration in the effluent:

$$0.96 \text{ mgd}*C*8.34 = 0.3 * (116.3+1.4) * 8.34$$

$$C = 37 \text{ PPM MAX.}, = 294.4 \text{ LBS/D}$$

$$C = 12.6 \text{ PPM AVE.}, = 117.4 \text{ LBS/D}$$



4.9 lbs/d max, 3.3 lbs/d ave.

The current technology, activated carbon filter, is well suited for removing phenol. Since current limits have been maintained they will be continued as representing technology based limits.

2. FINAL LIMITS

A. BOD5

Water Quality Monitoring limit for a 7Q10 = 0 stream is BOD5 ave = 10mg/l.

Mass limits BOD5

$$1.4*8.34*10$$
mg/l = 117 lbs/d ave $1.4*8.34*15$ mg/l = 175 lbs/d max

The following current discharge mass loadings from the application illustrates that the Current control technology has not been reaching the proposed limits.

Max. daily	Max 30 day ave
1747 lbs/d	871 lbs/d

B. TSS

Proposed limits are based upon Best Professional Judgement.

The existing system can meet the average but not the max limit as illustrated by the following 2-C information.

TSS reported: 126 LBS/D AVE, 542 LBS/D MAX

C. Oil and Grease

Proposed limits: 10 mg/l ave, 15 mg/l max

$$1.4 *8.34*10 \text{ mg/l} = 116.7 \text{ lbs/d}$$

 $1.4 *8.34*15 \text{ mg/l} = 175 \text{ lbs/d}$

The proposed limits are based upon the minimum amount of oil that will produce an oil sheen on the water surface.





D. Phenol

State Water Quality Limits are 0.3 mg/l max, 0.102 mg/l ave. These limits translate to:
0.3 mg/l * 1.4 MGD * 8.34 = 3.5 LBS/D
0.102 MG/L * 1.4 MGD * 8.34 = 1.19 LBS/D

These discharge limits are more stringent than previous limits. (4.9 lbs/d, 3.3 lbs/d ave) Form 2-C list Phenol at a concentration of 0.829 mg/l. This concentration is above the proposed limits.

E. TOC

There are no established limits for TOC, therefore the existing limits will be used factoring in the reduced production as compared to production during the last permit period ie: 935,655 / 1,292,400 (LBS OF PRODUCTS) = $0.72 \cdot 0.72*3800 = 2,436$ LBS/D MAX

0.72*2500 = 1755 LBS/D AVE. These limits are being met by current technology, activated carbon filter.

XI. PROPOSED LIMITS FOR DISCHARGE, FINAL LIMITS (lbs/day)

			existing limits	İ	
	Monthly ave.	Daily Max.	<u>ave</u>	<u>max</u>	Basis
BOD5	53(116.8)	79.54(175.2)	(1634)	(3051)	WQ
Am.(N)	10.6(23.35)	15.92(35)	NONE	NONE	wo
TSS	191(421)	531(1170)	(579)	(1648)	BPJ
TOC	796(1755)	1107(2436)	(2500)	(3800)	BPJ
Oil/g	53.1(117)	79.5(175)	(660)	(990)	BPJ
Phenol	.54(1.19)	1.6(3.5)	(3.3)	(4.9)	wo
Chronic	Toxicity Monotoring			•	

XII. PROPOSED LIMITS, INTERIM LIMITS (lbs/day)

			existing	limits	
	Monthly ave	Daily Max	ave	max	Basis
BOD5	565.5(1244.1)	1056(2322.2)	(1634)	(3051)	
TSS	255(560.7)	708(1557.5)	(579)	(1648)	CAT
TOC	796(1755)	1107(2436)	(2500)	(3800)	BPJ
Oil/g	300(660)	450(990)	(660)	(990)	BPJ
Phenol	1.5(3.3)	2.2(4.9)	(3.3)	(4.9)	wo
Acute To	oxicity Monitoring		, ,	` ,	

XIII. BATEA STATEMENT: It is our Best Professional Judgement (BPJ) the foregoing effluent limitations and permit conditions represent Best Available Technology Economically Achievable (BATEA).

ATTACHMENT I

TOXICITY SCREENING FOR BOWIE RIVER

Qw = .96 MGD(TOTAL 1.4 INCLUDES NON-CONTACT COOLING WATER)

Or = 116.3MGD

IWC = 0.96 MGD/(1.4+116.3)*100% = .8%

Xr = 0 assumed for all parameters

Total Al

Xw = .220*10 = 2.2 (less than 12 samples)

Xt = 2.2*.96/(1.4+116.3) = .02 mg/l

AWQC = .750 mg/l

CWQC = .087 mg/l

Total Boron

Xw = .22*10 = 2.2 (less than 12 samples)

Xt = 2.2*.96/(1.4+116.3) = .020

AWQC = no data

CWQC = .750 mg/ l

Total Ni

Xw = .01*10 = .1 (less than 12 samples)

Xt = .1 *.96/(1.4+116.3) = .0008

AWQC = .787 mg/l

CWQC = .087 mg/l

Total Selenium

Xw = .009*10 = .09 (less than 12 samples)

Xt = .09 * .96/(1.4 + 116.3) = .0008

AWQC = .02 mg/l

CWQC = .005 mg/l

Total Zinc

Xw = .04 *10 = .4 (less than 12 samples)

Xt = .4*.96/(1.4+116.3) = .0042

AWQC = .0636 mg/l

CWQC = .0581 mg/l

Phenol

Xw = .829 mg/l

Xt = .829*.96/(1.4+116.3) = .0083 mg/l

AWQC = .3 mg/l

CWQC = .1 mg/l

ACUTE TOXICITY SCREENING SUMMARY (EXISTING LIMIT BASIS)

Parameter	AWOC	$\underline{\mathbf{X}}\mathbf{t}$	PASS/FAIL
	mg/l	mg/l	
Total Al	.750	.026	PASS
Total Boron	no data	.02	
Total Nickel	.787	.0012	PASS
Total Selenium	.02	.001	PASS
Total Zinc	.0636	.005	PASS
Phenol	.3	099	PASS

CHRONIC TOXICITY SCREENING SUMMARY

Parameter	CWOC	$\underline{\mathbf{X}}\mathbf{t}$	PASS/FAIL
	mg/l	mg/l	
Total Al	.087	.026	PASS
Total Boron	.750	.02	PASS
Total Nickel	.087	.0012	PASS
Total Selenium	.005	.001	PASS
Total Zinc	.0581	.005	PASS
Phenol	.102	.099	PASS

TOXICITY SCREENING MATRIX

permit requirements

IWC	CSSa	CSSp	WETp	<u>CSI</u>	WETI	WETm
2.4%	P	P	P	Y	Y	N/A



ACUTE TOXICITY SCREENING SUMMARY (Xt=Xw*.96/1.4)

<u>Parameter</u>	AWOC mg/l	Xt mg/l	PASS/FAIL
	8		
Total Al	.750	1.5	FAIL
Total Boron	no data		
Total Nickel	.787	.68	FAIL
Total Selenium	.02	.062	FAIL
Total Zinc	.0636	.272	FAIL
Phenol	.3	.564	FAIL

CHRONIC TOXICITY SCREENING SUMMARY (Xt = Xw*.96/1.4)

<u>Parameter</u>	CWOC	<u>Xt</u>	PASS/FAIL
08	mg/l	mg/l	
Total Al	.087	1.5	FAIL
Total Boron	.750	1.5	FAIL
Total Nickel	.087	.068	PASS
Total Selenium	.005	.062	FAIL
Total Zinc	.0581	.272	FAIL
Phenol	.102	.564	FAIL

TOXICITY SCREENING MATRIX

permit requirements

<u>IWC</u>	CSSa	CSSp	WETp	<u>CS1</u>	WETI	WETm
100%	f	f	N/A	Y	Y	N/A

FACT SHEET

APPLICATION FOR NATIONAL POLLUTANT DISCHARGE ELIMINATION SYSTEM PERMIT TO DISCHARGE WASTEWATER TO WATERS OF THE STATE OF MISSISSIPPI

Application No.: MS0001830 (Reissuance)

Date: June 4,1997

1. SYNOPSIS OF APPLICATION

a. Name and Address of Applicant

Hercules Incorporated
613 West 7th Street
P.O. Box 1937
Hattiesburg, MS 39401
Contact: Mr. Charles Jordan
(601) 545-3450

b. Description of Applicant's Operation

Manufacture of modified resins, resin solutions and paper chemicals.

Applicable guidelines:

40CFR Part 454 Gum and Wood Chemical Manufacturing Point Source Category, Subpart C Woodrosin, Turpentine and Pine Oil. 40CFR Part 428 Rubber Manufacturing Point Source Category,

c. Production Capacity of Facility

N/A

d. Description of Existing Pollution Abatement Facilities

Sedimentation, floatation, neutralization, and carbon adsorption.

e. Applicant's Receiving Waters

Bowie River

f. Description of Discharges

Outfall 001 - 0.96 MGD(internal outfall into 002) Outfall 002 - 1.4 MGD





Bowie River 7Q10 = 116.3 mgd

2. PROPOSED EFFLUENT LIMITATIONS

see rationale

3. MONITORING REQUIREMENTS

The applicant will be required to monitor regularly for flow and those parameters limited in Section 2 above with sufficient frequency to ensure compliance with the permit conditions. Frequency, methods of sampling, and reporting dates will be specified in the final permit. Acute Toxicity Monitoring will be performed for the first three years of the permit. The required passing dilution is three percent. Chronic Toxicity Monitoring shall be performed for the last two years of the permit. The required passing dilution is one-hundred percent.

4. PROPOSED COMPLIANCE SCHEDULE FOR ATTAINING EFFLUENT LIMITATIONS

The facility will have three years to achieve proposed permit requirements.

- 5. PROPOSED CONDITIONS OF APPLICABILITY AND OTHER REQUIREMENTS
 - See attached permit rationale.
- 6. WATER QUALITY STANDARDS AND EFFLUENT STANDARDS APPLIED TO THE DISCHARGE

See attached permit rationale.

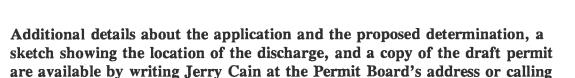
7. PROCEDURES FOR THE FORMULATION OF FINAL DETERMINATIONS

a. Comment Period

The Mississippi Office of Environmental Quality Permit Board proposes to issue an NPDES permit to this applicant subject to the effluent limitations and special conditions outlined above. These determinations are tentative.

Interested persons are invited to submit written comments on the permit application or on the Permit Board's proposed determinations to the following address:

Mississippi Department of Environmental Quality Office of Pollution Control P. O. Box 10385 Jackson, Mississippi 39209



All comments received prior to June 30, 1997, will be considered in the formulation of final determinations with regard to this application.

b. Public Hearing

Charles Cook at 961-5171.

The Permit Board may hold a public hearing if there is a significant degree of public interest in a proposed permit or group of permits. Public notice of such a hearing will be circulated in newspapers in the geographical area of the discharge and to those on the agency's mailing list at least 30 days prior to the hearing.

Following the public hearing, the Permit Board may take such modifications in the terms and conditions of the proposed permits as may be appropriate and shall issue or deny the permit. Notice of issuance or denial will be circulated to those who participated in the hearing and to appropriate persons on the mailing list.

c. Issuance of the Permit When No Public Hearing is Held

If no public hearing is held, and, after review of the comments received, the Permit Board's determinations are substantially unchanged, the permit will be issued and become effective immediately.

If no public hearing is held, but there have been substantial changes, public notice of the Permit Board's revised determinations will be made. Following a 30-day comment period, the permit will be issued and become effective immediately, unless a public hearing is granted.

PUBLIC NOTICE Mississippi Environmental Quality Permit Board P. O. Box 10385 Jackson, MS 39209 Telephone No. (601) 961-5171

June 1, 1997

Hercules Incorporated, located at 613 West 7th Street P.O.10385 Hattiesburg, Ms. 39209, has applied to the Mississippi Environmental Quality Permit Board for the reissuance of an NPDES Permit to discharge treated chemical process waste water and non-contact coolingwater from a waste water treatment system to a tributary of the Bowie River. The applicant's operation manufacters resins and paper chemicals. One discharge is described in the application.

The environmental impact of this project has been evaluated and the staff of the Permit Board believes that, with proper environmental constraints and limitations on the applicant, this project will operate within all State and Federal environmental laws and standards. Therefore, the staff of the Board has preliminarily decided, based on available information, to recommend to the Board that a permit be issued containing numerous environmental regulatory constraints specifically stated in the draft permit. However, before proceeding further with the staff evaluation, public comments are being solicited. The staff recommendation to the Board, as well as the Board decision, will be made only after a thorough consideration of all public comments.

Persons wishing to comment upon or object to the proposed determinations are invited to submit comments in writing to Jerry Cain at the Permit Board's address shown above, no later than June 30, 1997. All comments received by that date will be considered in the formulation of final determinations regarding the application. A public hearing will be held if the Permit Board finds a significant degree of public interest in the proposed permit.

Additional details about the application and the proposed determination, a sketch showing the location of the discharge, and a copy of the draft permit are available by writing or calling Charles Cook at the Permit Board's address and telephone number shown above. Also, this and other information is available for review and copying during normal business hours at the Southport Center Building located at 2380 Highway 80 West, Jackson, MS.

Please bring the foregoing to the attention of persons whom you know will be interested.

State of Mississippi Swater Pollutical Control

PERMIT

TO DISCHARGE WASTEWATER IN ACCORDANCE WITH THE NATIONAL POLLUTANT DISCHARGE ELIMINATION SYSTEM

THIS CERTIFIES THAT

HERCULES INCORPORATED HATTIESBURG, MISSISSIPPI

has been granted permission to discharge wastewater into

Bowie River

in accordance with effluent limitations, monitoring requirements and other conditions set forth in Parts I, II, and all nereof. This permit is issued in accordance with the provisions of the Mississippi water Pollution Control Law (Section 49-13-1) et seq., Mississippi Code of 1972), and the regulations and standards adopted and promulgated thereunder, and under authority granted pursuant to Section 402(b) of the Federal Water Pollution Control Act.

MISSISSIPPI ENVIRONMENTAL QUALITY PERMIT BOARD

HEAD, OFFICE OF POLLUTION CONTROL MISSISSIPPI DEPARTMENT OF ENVIRONMENTAL QUALITY

Issued: October 22, 1991

Permit No. MS0001830

Expires: October 21, 1996

A. EFFLUENT LIMITATIONS AND MONITORING REQUIREMENTS

During the period beginning October 22, 1991, and lasting until October 21, 1996, the permittee is authorized to discharge from outfall(s) serial number(s) 002 (Total Facility Discharge - Process Wastewater, Non-Contact Cooling Water and Stormwater Runoff).

Such discharges shall be limited and monitored by the permittee as specified below:

TREMENTS	Sample	Recorder Grab
Honitoring requirement	Measurement Frequency	Continuous 3 Days/Week
	(Specify) Daily Max.	Report 41(105)
DISCHARGE LIMITATIONS	Other Units Daily Avg.	Report N/A
DISCHARGE	kg/day (lbs/day) y Avg. Daily Max.	N/A N/A
	kg/day Daily Avg.	N/A N/A
		(MGD) °C(°F)
Paraheter		Flow-M ³ /day (MGD) Temperature C(^o F)

- The pH shall not be less than 6.0 standard units nor greater than 9.0 standard units and shall be monitored daily with a grab sample of the effluent. 8
- There shall be no discharge of floating solids or visible foam in other than trace amounts. w.
- The discharge shall not cause the occurrence of a visible sheen on the surface of the receiving waters. 4
- the mearest accessible point after mixing with Outfall (001) but prior to mixing with the receiving Samples taken in compliance with the monitoring requirements specified above shall be taken at the following location(s): Ŋ.
- No chemicals, such as chlorine, zinc or chromium shall be added to the cooling water without the prior written approval by the Office of Pollution Control in accordance with Part III.C. page 14 of 16. 9





C. MONITORING AND REPORTING

1. Representative Sampling

Samples and measurements taken as required herein shall be representative of the volume and nature of the monitored discharge.

2. Reporting

Monitoring results obtained Juring the previous month shall be summarized and reported on a Discharge Monitoring Report Form (EPA No. 3320-1) POSTMARKED NO LATER THAN THE 28TH DAY OF THE MONTH FOLLOWING THE COMPLETED REPORTING PERIOD. THE FIRST REPORT IS DUE ON DECEMBER 28, 1991. Copies of these, and all other reports required herein, shall be signed in accordance with Sections 6 and 7 of the Mississippi Wastewater Permit Regulations, and shall be submitted to the Mississippi Environmental Quality Permit Board at the following address.

MISSISSIPPI DEPARTMENT OF ENVIRONMENTAL QUALITY OFFICE OF POLLUTION CONTROL P. O. Box 10385 Jackson, Mississippi 39289-0385

3. Test Procedures

Test procedures for the analysis of pollutants shall conform to regulations published pursuant to Section 304(h) of the Federal Water Pollution Control Act, as amended.

4. Recording of Results

For each measurement or sample taken pursuant to the requirements of this permit, the permittee shall record the following information:

- (a) The exact place, date, and time of sampling;
- (b) The dates the analyses were performed;
- (c) The person(s) who performed the analyses;
- (d) The analytical techniques or methods used; and
- e) The results of all required analyses.

5. Records Retention

(a) All records and information resulting from the monitoring activities required by this permit (including all records of; analyses performed; calibration and maintenance of instrumentation; and recording from continuous monitoring instrumentation) shall be retained for a minimum of three (3) years, or longer if requested by the Permit Board.



PART II

A. MANAGEMENT REQUIREMENTS

1. Change in Discharge

All discharges authorized herein shall be consistent with the terms and conditions of this permit. The discharge of any pollutant identified in this permit more frequently than or at a level in excess of that authorized shall constitute a violation of the permit. Any anticipated facility expansions or treatment modifications which will result in new, different, or increased discharges of pollutants must be reported by submission of a new NPDES application. If such changes will not violate the effluent limitations specified in this permit, and upon written notice (in lieu of a new NPDES application) to the Mississippi Environmental Quality Permit Board, the permit may be modified to specify and limit any pollutants not previously limited.

2. Duty to Comply 40 CFR 122.41(a)

The permittee must comply with all conditions of this permit. Any permit noncompliance constitutes a violation of the Clean Water Act and is grounds for enforcement action; for permit termination, renovation and reissuance, or modification; or for denial of a permit renewal application.

3. Noncompliance Notification

If, for any reason, the permittee does not comply with or will be unable to comply with any provision specified in this permit, the permittee shall notify the Mississippi Environmental Quality Permit Board orally within 24 hours of becoming aware of such conditions. A written report shall also be provided within five (5) days of such time and shall contain the following information:

- a. A description of the discharge and cause of noncompliance; and
- b. The period of noncompliance, including exact dates and times; or if not corrected, the anticipated time the noncompliance is expected to continue, and steps being taken to reduce, eliminate and prevent recurrence of the noncomplying discharge.

4. Facilities Operation

The permittee shall at all times maintain in good working order and operate as efficiently as possible all treatment or control facilities or systems installed or used by the permittee to achieve compliance with the terms and conditions of this permit.

- (3) The permittee submitted notice of the upset as required in 40 CFR 122.41 (L)(6)(ii)(B) (24 hour notice of noncompliance).
- (4) The permittee complied with any remedial measures required under 40 CFR 122.41 (d) (duty to mitigate).
- d. Burden of proof. In any enforcement proceeding the permittee seeking to establish the occurrence of an upset has the burden of proof.

8. Removed Substances

Solids, sludges, filter backwash, or other residuals removed in the course of treatment or control of wastewater shall be disposed of in a manner such as to prevent such materials from entering State waters and in a manner consistent with the Mississippi Solid Waste Disposal Act and the Federal Resource Conservation and Recovery Act.

9. Power Failures

In order to maintain compliance with the effluent limitations and prohibitions of this permit, the permittee shall either:

- a. In accordance with the Schedule of Compliance contained in Part I, provide an alternate power source sufficient to operate the wastewater collection and treatment facilities, or, if such alternate power source is not in existence, and no date for its implementation appears in Part I;
- b. Provide a method whereby the effluent limitations contained in Part I shall be met upon the reduction, loss, or failure of the primary source of power to the wastewater collection and treatment facilities.

B. RESPONSIBILITIES

1. Right of Entry

The permittee shall allow the Mississippi Environmental Quality Permit Board and the Regional Administrator of the U. S. Environmental Protection Agency and/or their authorized representatives, upon the presentation of credentials.

a. To enter upon the permittee's premises where an effluent source is located or in which any records are required to be kept under the terms and conditions of this permit; and



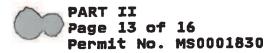
- (2) The authorization specifies either an individual or a position having responsibility for the overall operation of the regulated facility or activity, such as the position of plant manager, operator of a well or a well field, superintendent, position having overall responsibility for environmental matters for the company. (A duly authorized representative may thus be either a named individual or any individual occupying a named position.); and
- (3) The written authorization is submitted to the Permit Board.
- c. Changes to authorization. If an authorization under paragraph (b) of this section is no longer accurate because a different individual or position has responsibility for the overall operation of the facility, a new authorization satisfying the requirements of paragraph (b) of this section must be submitted to the Permit Board prior to or together with any reports, information, or applications.
- d. Certification. Any person signing a document under paragraphs (a) or (b) of this section shall make the following certification:

"I certify under penalty of law that this document and all attachments were prepared under the direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations."

4. Availability of Records

Except for data determined to be confidential under the Mississippi Water Pollution Control Law, all reports prepared in accordance with the terms of this permit shall be available for public inspection at the office of the Mississippi Department of Environmental Quality Office of Pollution Control.





9. Oil and Hazardous Substance Liability

Nothing in this permit shall be construed to preclude the institution of any legal action or relieve the permittee from any responsibilities, liabilities, or penalties to which the permittee is or may be subject to under Section 311 of the Federal Water Pollution Control Act and applicable provisions of the Mississippi Water Pollution Control Law pertaining to spills of oil and hazardous materials.

10. Property Rights

The issuance of this permit does not convey any property rights in either real or personal property, or any exclusive privileges, nor does it authorize any injury to private property or any invasion of personal rights, nor any infringement of Federal, State, or local laws or regulations.

11. Severability

The provisions of this permit are severable, and if any provision of this permit, or the application of any provision of this permit to any circumstance, is held invalid, the application of such provision to other circumstance, and the remainder of this permit, shall not be affected thereby.

12. Expiration of Permit

The permittee shall not discharge after the expiration date of this permit unless he has submitted a completed application for reissuance no later than 180 days prior to the expiration date. The Head of the Office of Pollution Control may grant permission to submit an application later than this, but no later than the expiration date of the permit.





D. ACUTE BIOASSAY REQUIREMENTS

The Water Quality Standards of Mississippi require that all waters be free from substances in concentrations or combinations which are harmful to humans, animals, or aquatic life (State of Mississippi, Water Quality Criteria for Intrastate, Interstate and Coastal Waters, Section II.4. Minimum Conditions Applicable to All Waters, page 3, adopted March 22, 1990). In accordance with such requirements, the permittee is authorized to discharge from the combined outfall(s) 001 and 002 only in accordance with the following conditions:

- 1. The permittee shall perform 48-hour static definitive toxicity tests in accordance with Methods for Measuring the Acute Toxicity of Effluents to Freshwater and Marine Organisms Third Edition, (EPA-600/4-85/013). Static tests will be conducted on a 24-hour composite sample of effluent. Less than 36 hours will elapse between sampling and the use of the sample.
 - a. The permittee must use both the following organisms:
 - (1) Pimephales promelas (fathead minnows)
 - (2) Ceriodaphnia dubia (water fleas)
 - b. Dilution water used for these tests shall consist of reagent grade water, defined as distilled or deionized water that does not contain substances which are toxic to the test organisms. Dilution water shall consist of reagent grade water to which the appropriate reagent grade salts have been added to make moderately hard dilution water according to Short-Term Methods for Estimating the Chronic Toxicity of Effluents and Receiving Waters to Freshwater Organisms

 (EPA/600/4-89/001). These dilution waters will be deemed acceptable if the control organisms in the toxicity tests meet the minimum EPA criteria for mortality.



State of Mississippi Water Pollution Control PERMIT

TO DISCHARGE WASTEWATER IN ACCORDANCE WITH THE NATIONAL POLLUTANT DISCHARGE ELIMINATION SYSTEM

THIS CERTIFIES THAT

HERCULES INCORPORATED
HATTIESBURG, MISSISSIPPI

has been granted permission to discharge wastewater into

001 - unnamed tributary of the Bowie River

in accordance with effluent limitations, monitoring requirements and other conditions set forth in Parts I, II, and III hereof. This permit is issued in accordance with the provisions of the Mississippi Water Pollution Control Law (Section 49-17-1 et seq., Mississippi Code of 1972), and the regulations and standards adopted and promulgated thereunder, and under authority granted pursuant to Section 402(b) of the Federal Water Pollution Control Act.

MISSISSIPPI ENVIRONMENTAL QUALITY PERMIT BOARD

HEAD, OFFICE OF POLLUTION CONTROL MISSISSIPPI DEPARTMENT OF ENVIRONMENTAL QUALITY

Issued:

Permit No. MS0001830

Expires:

PART I

A. EFFLUENT LIMITATIONS AND MONITORING REQUIREMENTS

During the period beginning 1996, and lasting until 1999, the permittee is authorized to discharge from outfall(s) serial number(s) 001 (Process Wastewater). **.**

Such discharges shall be limited and monitored by the permittee as specified below:

MONITORING REQUIREMENTS	ecify) Measurement Sample ily Max. Frequency Type	Report Continuous Recorder		3 Days/Week	3	3 Days/Week	3 Days/Week
DISCHARGE LIMITATIONS	Other Units (Specify) Max. Monthly Avg. Daily Max.	Report Re	Report	Report	Report	Report	Report
DISCH	kg/day (lbs/day) Monthly Avg. Daily Max.	;	_		1107 (2436		
	kg/ Monthly	(C	•		-		1.5(3.3)
PARAMETER		Flow-M³/day (MGD) Biochemical Oxygen	Demand (5-Day	Total Suspended	Total Organic C	Oil and Grease	Phenol

- There shall be no discharge of floating solids or visible foam in other than trace amounts. 7
- The discharge shall not cause the occurrence of a visible sheen on the surface of the receiving waters.
- Samples taken in compliance with the monitoring requirements specified above shall be taken at the following location(s): the nearest accessible point after final treatment but prior to mixing with the receiving streams.

PART I

A. EFFLUENT LIMITATIONS AND MONITORING REQUIREMENTS

During the period beginning 1999, and lasting until 2000, the permittee is authorized to discharge from outfall(s) serial number(s) 002 (Storm Water, Noncontact Cooling Water, and Outfall 001). ä

Such discharges shall be limited and monitored by the permittee as specified below:

		8
JIREMENTS	Sample Type	Recorder Grab
MONITORING REQUIREMENT	Measurement Frequency	Continuous 3 Days/Week
	(Specify) Daily Max.	Report 41 (105)
DISCHARGE LIMITATIONS	Other Units (Specify) Monthly Avg. Daily Max.	Report
DISCHARGE	kg/day (lbs/day) Monthly Avg. Daily Max.	::
	kg/day (Monthly Avg.	1 1
PARAMETER		Flow-M³/day (MGD) Temperature °C (°F)

- The pH shall not be less than 6.5 standard units nor grater than 9.0 standard units and shall be monitored continuously with a grab sample of the effluent. 7
- There shall be no discharge of floating solids or visible foam in other than trace amounts.
- The discharge shall not cause the occurrence of a visible sheen o ϕ the surface of the receiving waters. 4
- Samples taken in compliance with the monitoring requirements specified above shall be taken at the following location(s): the nearest accessible point after final treatment but prior to mixing with the receiving streams.

PART I

A. EFFLUENT LIMITATIONS AND MONITORING REQUIREMENTS

- During the period beginning 1999, and lasting until 2006, the permittee is authorized to discharge from outfall(s) serial number(s) 001 (Process Wastewater). . H
- Such discharges shall be limited and monitored by the permittee as specified below:

PARAMETER		DISCHARGE	DISCHARGE LIMITATIONS		MONITORING REQUIREMENTS	Trements
	kg/day (lbs/day) Monthly Avg. Daily Max.	bs/day) Daily Max.	Other Units (Specify) Monthly Avg. Daily Max.	(Specify) Daily Max.	Measurement Frequency	Sample Type
Flow-M ³ /day (MGD)	1	1	Report	Report	Continuous	Recorder
blocnemical Oxygen Demand (5-Day)	79.54(175.2)	53 (117)	Report	Report	3 Days/Week	24-Hr. Composite
Total Suspended Solids	159 (350)	240 (525)	Report	Report	3 Days/Week	24-Hr. Composite
Ammonia Nitrogen (as N) Total Organic Carbon	796 (1755)	1107 (2436)	Report	Report	3 Days/Week	24-Hr. Composite
Oil and Grease	79.5(175)	53.1(117)	Report	Report	3 Days/Week	Grab
Phenol	.54(1.19)	1.6(3.5)	Report	Report	3 Days/Week	Grab

- There shall be no discharge of floating solids or visible foam in other than trace amounts.
- The discharge shall not cause the occurrence of a visible sheen on the surface of the receiving waters.
- Samples taken in compliance with the monitoring requirements specified above shall be taken at the following location(s): the nearest accessible point after final treatment but prior to mixing with the receiving streams.
- These limits shall be complied with three (3) years after permit issuance. ъ.

A. EFFLUENT LIMITATIONS AND MONITORING REQUIREMENTS

During the period beginning, and lasting until, the permittee is authorized to discharge from outfall(s) serial number(s) 002 (Storm Water, Noncontact Cooling Water and Outfall 001). ;

Such discharges shall be limited and monitored by the permittee as specified below:

va		Recorder Instantaneous
UIKEMENT	Sample Type	
MONITORING REQUIREMENTS	Measurement Frequency	Continuous 3 Days/Week
MOM		Ŭm
	Other Units (Specify) Monthly Avg. Daily Max.	Report 32 (90)
TTONS	er Units ly Avg.	H H t t
WITWIT 5		Report Report
DISCHARGE LIMITATIONS	(lbs/day) g. Daily Max.	t 1 1 1
	kg/day (1 Monthly Avg.	
	k Month	::
		(MGD) •C (•F)
AKAMETEK		Flow-M³/day (MGD) Temperature °C(°F)
H.		표 16

- The pH shalal not be less than 6.5 standard units nor greater than 9.0 standard units and shall be monitored continuously with a grab sample of the effluent. 2
- There shall be no discharge of floating solids or visible foam in other than trace amounts. ന
- The discharge shall not cause the occurrence of a visible sheen on the surface of the receiving waters. 4
- Samples taken in compliance with the monitoring requirements specified above shall be taken at the following location(s): the nearest accessible point after final treatment but prior to mixing with the receiving streams. . Ω

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B. SCHEDULE OF COMPLIANCE

1. The permittee shall achieve compliance with the effluent limitations specified for discharge in accordance with the following schedule:

Upon permit issuance

2. Within 14 days after either an interim or final date of compliance specified in Part I.B.1., the permittee shall provide the Permit Board with written notice of his compliance or noncompliance with the requirements or conditions specified to be completed by that date.

Not applicable.

C. DEFINITIONS

- 1. "Monthly average" means the average of "daily discharges" over a calendar month, calculated as the sum of all "daily discharges" measured during a calendar month divided by the number of "daily discharges" measured during the month. The monthly average for fecal coliform bacteria is the geometric mean of "daily discharges" measured during the calendar month. In computing the geometric mean for fecal coliform bacteria, the value one (1) shall be substituted for sample results of zero.
- 2. "Daily discharge" means the "discharge of a pollutant" measured during a calendar day or any 24-hour period that reasonably represents the calendar day for purposes of sampling. For pollutants with limitations expressed in units of mass, the "daily discharge" is calculated as the total mass of the pollutant discharged over the day. For pollutants with limitations expressed in other units of measurements, the "daily average" is calculated as the average measurement of the discharge of the pollutant over the day.
- "Daily maximum" means the highest "daily discharge" over a calendar month.

- 4. "Toxic pollutants" include, but are not limited to: (a) any toxic substance listed in Section 307(a)(1) of the Clean Water Act (CWA), any chemical listed in Section 313(c) of the Superfund Amendments and Reauthorization Act of 1986; and (b) any substance (that is not also a conventional or nonconventional pollutant) for which EPA or the State has published an acute or chronic toxicity criterion.
- 5. "Hazardous substances" are defined in 40 CFR 116.4.

D. MONITORING AND REPORTING

1. Representative Sampling

Samples and measurements taken as required herein shall be representative of the volume and nature of the monitored wastewater.

- 2. Reporting
 - a. Monitoring results obtained during the previous month shall be summarized and reported on a Discharge Monitoring Report Form (EPA No. 3320-1) POSTMARKED NO LATER THAN THE 28TH DAY OF THE MONTH FOLLOWING THE COMPLETED REPORTING PERIOD. THE FIRST REPORT IS DUE ON . Copies of these, and all other reports required herein, shall be signed in accordance with Chapter One Sections II.C. and II.E. of the Mississippi Wastewater Permit Regulations, and shall be submitted to the Mississippi Environmental Quality Permit Board at the following address.

MISSISSIPPI DEPARTMENT OF ENVIRONMENTAL QUALITY
OFFICE OF POLLUTION CONTROL
P. O. Box 10385
Jackson, Mississippi 39289-0385

- If the results for a given sample analysis are such that any b. parameter (other than fecal coliform) is not detected at or above the minimum level for the test method used, a value of zero will be used for that sample in calculating an arithmetic mean value for the parameter. If the resulting calculated arithmetic mean value for that reporting period is zero, the permittee shall report "NODI = B" on the DMR. For fecal coliform, a value of 1.0 shall be used in calculating the geometric mean. If the resulting fecal coliform mean value is 1.0, the permittee shall report "NODI = B" on the DMR. For each quantitative sample value that is not detectable, the test method used and the minimum level for that method for that parameter shall be attached to and submitted with the DMR. The permittee shall then be considered in compliance with the appropriate effluent limitation and/or reporting requirement.
- c. If the permittee monitors any pollutant as prescribed in the permit more frequently than required by the permit using test procedures approved under 40 CFR Part 136 or, in the case of sludge use or disposal, approved under 40 CFR Part 136 unless otherwise specified in 40 CFR Part 503, or as specified in the permit, the results of this monitoring shall be included in the calculation and reporting of the data submitted in the DMR or sludge reporting form specified by the Permit Board.
- d. Calculations for all limitations which require averaging of measurements shall utilize an arithmetic mean unless otherwise specified by the Permit Board in the permit.

3. Test Procedures

Test procedures for the analysis of pollutants shall conform to regulations published pursuant to Section 304(h) of the Federal Water Pollution Control Act, as amended or alternative procedures approved and/or promulgated by EPA. For those parameters listed in Exhibit D of the Mississippi Wastewater Permit Regulations, the permittee shall use approved methods with minimum quantification levels as sensitive as those found in Exhibit D of the regulations.

4. Recording of Results

For each measurement or sample taken pursuant to the requirements of this permit, the permittee shall maintain records of all information obtained from such monitoring including:

- (a) The exact place, date, and time of sampling;
- (b) The dates the analyses were performed;
- (c) The person(s) who performed the analyses;
- (d) The analytical techniques, procedures or methods used; and
- (e) The results of all required analyses.

5. Records Retention

All records and results of monitoring activities required by this permit, including calibration and maintenance records, shall be retained by the permittee for a minimum of three (3) years, unless otherwise required or extended by the Permit Board, copies of which shall be furnished to the Department upon request.

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6. Falsifying Reports

Any permittee who falsifies, tampers with, or knowingly renders inaccurate any monitoring device or method required by the Permit Board to be maintained as a condition in a permit, or who alters or falsifies the results obtained by such devices or methods and/or any written report required by or in response to a permit condition, shall be deemed to have violated a permit condition and shall be subject to the penalties provided for a violation of a permit condition pursuant to Section 49-17-43 of the Code.

PART II

A. MANAGEMENT REQUIREMENTS

1. Facility Expansion and/or Modification

Any facility expansion, production increases, process modifications, changes in discharge volume or location or other changes in operations or conditions of the permittee which may result in a new or increased discharge of waste, shall be reported to the Permit Board by submission of a new application for a permit pursuant to Section II.A. of the Mississippi Wastewater Regulations, or if the discharges does not violate effluent limitations specified in the permit, by submitting to the Permit Board a notice of a new or increased discharge.

2. Duty to Comply 40 CFR 122.41(a)

The permittee must comply with all conditions of this permit. Any permit noncompliance constitutes a violation of the Clean Water Act and is grounds for enforcement action; for permit termination, revocation and reissuance, or modification; or denial of a permit renewal application.

- 3. Noncompliance Notification
 - a. Twenty-Four Hour Reporting
 - (1) The permittee shall report any noncompliance which may endanger health or the environment. Any information shall be provided orally within 24 hours from the time the permittee becomes aware of the circumstances. A written submission shall also be provided within 5 days of the time the permittee becomes aware of the circumstances. The written submission shall contain a description of the noncompliance and its cause; the period of noncompliance, including exact dates and times, and if the noncompliance has not been corrected, the anticipated time it is expected to continue; and steps taken or planned to reduce, eliminate, and/or prevent recurrence of the noncompliance.
 - (2) The following shall be included as information which must be reported within 24 hours under this paragraph.
 - i. Any unanticipated bypass which exceeds any effluent limitation in the permit.
 - ii. Any upset which exceeds any effluent limitation in the permit.
 - iii. Violation of a maximum daily discharge limitation for any of the pollutants listed by the Permit Board in the permit to be reported within 24 hours.

(3) The Executive Director may waive the written report on a case-by-case basis for reports under paragraph a. of this section if the oral report has been received within 24 hours.

b. Other Noncompliance

The permittee shall report all instances of noncompliance not reported under paragraph a., at the time monitoring reports are submitted or within 30 days from the end of the month in which the noncompliance occurs. The reports shall contain the information listed in paragraph a.

c. Other Information

Where the permittee becomes aware that it failed to submit any relevant facts in a permit application, or submitted incorrect information in a permit application or in any report to the Permit Board, it shall promptly submit such facts or information.

4. Proper Operation, Maintenance and Replacement

The permittee shall at all times properly operate, maintain, and when necessary, promptly replace all facilities and systems of collection, treatment and control (and related appurtenances) which are installed or used by the permittee to achieve compliance with the conditions of this permit. Proper operation and maintenance includes adequate laboratory controls and appropriate quality assurance procedures. Proper replacement includes maintaining an adequate inventory of replacement equipment and parts for prompt replacement when necessary to maintain continuous collection and treatment of wastewater. This provision requires the operation of back-up or auxiliary facilities or similar systems which are installed by a permittee only when the operation is necessary to achieve compliance with the conditions of the permit.

5. Duty to Mitigate

The permittee shall take all reasonable steps to minimize or prevent any discharge or sludge use or disposal in violation of the permit which has a reasonable likelihood of adversely affecting human health or the environment.

Bypassing

The permittee shall comply with the terms and conditions regarding bypass found in 40 CFR 122.41(m).

N N . N S

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7. Upsets

Permittee shall meet the conditions of 40 CFR 122.41(n) regarding "Upsets" and as follows:

- a. Definition. "Upset" means an exceptional incident in which there is unintentional and temporary noncompliance with technology based permit effluent limitations because of factors beyond the reasonable control of the permittee. An upset does not include noncompliance to the extent caused by operational error, improperly designed treatment facilities, inadequate treatment facilities, lack of preventive maintenance, or careless or improper operation.
- b. Effect of an upset. An upset constitutes an affirmative defense to an action brought for noncompliance with such technology based permit effluent limitations if the requirements of paragraph (c) of this section are met. Any determination made during administrative review of claims that noncompliance was caused by upset, and before an action for noncompliance, shall not constitute final administrative action subject to judicial review.
- c. Conditions necessary for demonstration of upset. A permittee who wishes to establish the affirmative defense of upset shall demonstrate, through properly signed contemporaneous operating logs, or other relevant evidence that:
 - (1) An upset occurred and that the permittee can identify the cause(s) of the upset;
 - (2) The permitted facility was at the time being properly operated; and
 - (3) The permittee submitted notice of the upset as required in 40 CFR 122.41(L)(6)(ii)(B)(24-hour notice of noncompliance).
 - (4) The permittee complied with any remedial measures required under 40 CFR 122.41(d) (Duty to Mitigate).
- d. Burden of proof. In any enforcement proceeding the permittee seeking to establish the occurrence of an upset has the burden of proof.

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8. Removed Substances

Solids, sludges, filter backwash, or other residuals removed in the course of treatment or control of wastewater shall be disposed of in a manner such as to prevent such materials from entering State waters and in a manner consistent with the Mississippi Solid Waste Disposal Act, the Federal Resource Conservation and Recovery Act, and the Mississippi Water Pollution Control Act.

9. Power Failures

If electric power is required, in order to maintain compliance with the conditions and prohibitions of the permit, the permittee shall either:

- a. Provide an alternative power source to operate the wastewater control facilities; or, if such alternative power source is not in existence, and no date for its implementation appears in the permit,
- b. Halt, reduce, or otherwise control production and/or all wastewater flows upon reduction, loss, or failure of the primary source of power to the wastewater control facilities.

B. RESPONSIBILITIES

Inspection and Entry

The permittee shall allow any authorized Commission representative to enter the permittee's premises at any reasonable time, to have access to and copy any applicable records, to inspect process facilities, treatment works, monitoring methods or equipment or to take samples, as authorized by Section 49-17-29 of the Code. In the event of investigation during an emergency response action, a reasonable time shall be any time of the day or night. Follow-up investigations subsequent to the conclusion of the emergency event shall be conducted at reasonable times.

2. Transfer of Ownership or Control

This permit is not transferable to any person except after proper notice and approval by the Permit Board. In the event of any change in control or ownership of facilities from which the authorized discharges emanate, the permittee shall notify the Mississippi Environmental Quality Permit Board at least thirty (30) days in advance of the proposed transfer date. The notice should include a written agreement between the existing and new permittees containing a specific date for the transfer of permit responsibility, coverage, and liability.

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3. Signatory Requirements 40 CFR 122.41(k)

All applications, reports, or information submitted to the Permit Board shall be signed and certified.

- a. All permit applications shall be signed as follows:
 - (1) For a corporation: by a responsible corporate officer. For the purpose of this Section, a responsible corporate officer means: (1) a president, secretary, treasurer or vice president of the corporation in charge of a principal business function, or any other person who performs similar policy or decision-making function for the corporation, or (2) the manager of one or more manufacturing, production, or operating facilities employing more than 250 persons or having gross annual sales or expenditures exceeding 25 million (in second quarter 1980 dollars), if authority to sign documents has been assigned or delegated to the manager in accordance with corporate procedures.
 - (2) For a partnership or sole proprietorship: by a general partner or the proprietor, respectively; or
 - (3) For a municipality, State, Federal, or other public agency: by either a principal executive officer or ranking elected official.
- b. All reports required by the permit and other information requested by the Permit Board shall be signed by a person described above or by a duly authorized representative of that person. A person is a duly authorized representative only if:
 - (1) The authorization is made in writing by a person described above;
 - (2) The authorization specifies either an individual or a position having responsibility for the overall operation of the regulated facility or activity, such as the position of plant manager, operator of a well or a well field, superintendent, position having overall responsibility for environmental matters for the company. (A duly authorized representative may thus be either a named individual or any individual occupying a named position.); and
 - (3) The written authorization is submitted to the Permit Board.

- c. Changes to authorization. If an authorization under paragraph (b) of this section is no longer accurate because a different individual or position has responsibility for the overall operation of the facility, a new authorization satisfying the requirements of paragraph (b) of this section must be submitted to the Permit Board prior to or together with any reports, information, or applications.
- d. Certification. Any person signing a document under paragraphs (a) or (b) of this section shall make the following certification:

"I certify under penalty of law that this document and all attachments were prepared under the direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations."

4. Availability of Records

Except for data determined to be confidential under the Mississippi Water Pollution Control Law, all reports prepared in accordance with the terms of this permit shall be available for public inspection at the office of the Mississippi Department of Environmental Quality Office of Pollution Control.

- 5. Duty to Provide Information
 - a. The permittee shall furnish to the Permit Board within a reasonable time any relevant information which the Permit Board may request to determine whether cause exists for modifying, revoking and reissuing, or terminating the permit, or to determine compliance with the permit.
- 6. Toxic Pollutants

The permittee shall comply with any toxic effluent standard or prohibition (including any schedule of compliance specified in such effluent standard or prohibition) established under Section 307(a) of the Federal Water Pollution Control Act.

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7. Toxic Pollutants Notification Requirements

The permittee shall comply with the applicable provisions of 40 CFR 122.42.

- 8. Civil and Criminal Liability
 - a. Any person who violates a term, condition or schedule of compliance contained within this permit or the Mississippi Water Pollution Control Law is subject to the actions defined by law.
 - b. Except as provided in permit conditions on "Bypassing" and "Upsets" (Part II, A-6 and 7), nothing in this permit shall be construed to relieve the permittee from civil or criminal penalties for noncompliance.
 - c. It shall not be the defense of the permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit.
- 9. Oil and Hazardous Substance Liability

Nothing in this permit shall be construed to preclude the institution of any legal action or relieve the permittee from any responsibilities, liabilities, or penalties to which the permittee is or may be subject to under Section 311 of the Federal Water Pollution Control Act and applicable provisions under Mississippi Law pertaining to transportation, storage, treatment, or spillage of oil or hazardous substances.

10. Property Rights

The issuance of this permit does not convey any property rights in either real or personal property, or any exclusive privileges, nor does it authorize any injury to private property or any invasion of personal rights, nor any infringement of Federal, State, or local laws or regulations.

11. Severability

The provisions of this permit are severable. If any provision of this permit, or the application of any provision of this permit to any circumstances, is challenged or held invalid, the validity of the remaining permit provisions and/or portions thereof or their application to other persons or sets of circumstances, shall not be affected thereby.

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Permit No. MS0001830

12. Expiration of Permit

At least 180 days prior to the expiration date of this permit pursuant to the State law and regulation, the permittee who wishes to continue to operate under this permit shall submit an application to the Permit Board for reissuance. The Permit Board may grant permission to submit an application later than this, but no later than the expiration date of the permit.

13. Protection of Confidential Information

- Pursuant to Miss. Code Ann. § 49-17-39 and 40 CFR 123.41, a. the Permit Board shall make available to the public all information contained on any form and all public comments on such information. Effluent data and information concerning air or water quality shall also be made available to the public. Information that is determined by the Commission to be trade secrets shall not be disclosed to the public without prior consent of the source of such information. When a claim of confidentiality is made by a person in accordance with the provisions of Miss. Code Ann. § 49-17-39, a recommendation on the questions of confidentiality shall be made by the Commission and forwarded to the Regional Administrator (or his/her designee) of EPA for his concurrence in such determination of confidentiality.
- b. A copy of a State, UIC, or NPDES permit application, public notice, fact sheet, draft permit and other forms relating thereto, including written public comment and other reports, files and information relating to the application not classified as confidential information by the Commission pursuant to Part II.B.13.a., shall be available for public inspection and copying during normal business hours at the office of the Department in Jackson, Mississippi.
- C. Upon determination by the Commission that information submitted by a permit applicant is entitled to protection against disclosure as trade secrets, the information shall be so labeled and otherwise handled as confidential. Copies of the information and a notice of the Commission's action shall be forwarded to the Regional Administrator (or his/her designee). In making its determination of entitlement to protection as a trade secret, the Commission shall follow the procedure set forth in Miss. Code Ann. § 49-17-39. In the event the Commission denies the claim of confidentiality, the applicant shall have, upon notification thereof, the right to appeal the Commission's determination in the same manner provided for other orders of the Commission. No disclosure, except to EPA, shall be allowed until any appeal from the determination of the Commission is completed.

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14. Spill Prevention and Best Management Plans

Any permittee which has above ground bulk storage capacity, of more than 1320 gallons or any single container with a capacity greater than 660 gallons, of materials and/or liquids (including but not limited to, all raw, finished and/or waste material) with chronic or acute potential for pollution impact on waters of the State and not subject to Mississippi Hazardous Waste Management Regulations or 40 CFR 112 (Oil Pollution Prevention) regulations shall provide secondary containment as found in 40 CFR 112 or equivalent protective measures such as trenches or waterways which would conduct any tank releases to a permitted treatment system or sufficient equalization or treatment capacity needed to prevent chronic/acute pollution impact.

PART III

A. REOPENER CLAUSE

This permit shall be modified, or alternately, revoked and reissued, to comply with any applicable effluent standard, limitation or storm water regulation issued or approved under Section 301(b)(2)(C), and (D), 304(b)(2), 307(a)(2) and 402(p) of the Federal Water Pollution Control Act if the effluent standard, limitation or regulation so issued or approved:

- Contains different conditions or is otherwise more stringent than any effluent limitation in the permit; or
- Controls any pollutant not limited in the permit.

B. CLOSURE REQUIREMENTS

Should the permittee decide to permanently close and abandon the premises upon which it operates, it shall so notify the Permit Board no later than 90 days prior to doing so. This Closure Plan shall address how and when all manufactured products, by-products, raw materials, stored chemicals, and solid and liquid waste and residues will be removed from the premises so that no potential environmental hazard to the waters of the State will be presented.

C. REQUIREMENTS REGARDING COOLING AND BOILER WATER ADDITIVES

Notification shall be made to the permitting authority in writing not later than sixty (60) days prior to initiating the addition of any chemical product to the cooling water and/or boiler water which is subject to discharge, other than those previously approved and/or used. Such notification should include, but not be limited to:

- 1. Name and composition of the proposed additive,
- 2. Proposed discharge concentration,
- 3. Dosage addition rates,
- 4. Frequency of use,
- 5. EPA registration, if applicable, and
- 6. Aquatic species toxicological data.

Written approval must be received from the permitting authority prior to initiating use.

D. OTHER STANDARD CONDITIONS

A Storm Water Pollution Study shall be submitted six months after permit issuance. The Study shall contain the following elements. The rainfall events that cause a bypass of the treatment system shall be identified. Both the intensity and duration of the events shall be listed. The capacity of the system shall be compared to the water generated by a 10-year worst case 24-hour storm. A process storm water minimization plan shall be developed to assess options on diverting flow from plant areas no longer involved in production. In addition, process areas shall be investigated to determine whether berming specific process areas to minimize flow is feasible. A compliance schedule that outlines the steps the facility will take to comply with the upcoming new permit limits shall be submitted within one year of permit issuance.

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E. ACUTE BIOASSAY REQUIREMENTS

The Water Quality Standards of Mississippi require that all waters be free from substances in concentrations or combinations which are harmful to humans, animals, or aquatic life (State of Mississippi, Water Quality Criteria for Intrastate, Interstate and Coastal Waters, page 3, adopted November 16, 1995). In accordance with such requirements, the permittee is authorized to discharge from outfall 002 only in accordance with the following conditions:

- 1. The permittee shall submit any existing toxicity data for review by the Mississippi Office of Pollution Control within 30 days of the effective date of this permit.
- 2. The permittee shall perform static renewal (tests that exceed 48 hours shall be renewed), definitive (a control and five effluent concentrations) toxicity tests at 25°C in accordance with Methods for Measuring the Acute Toxicity of Effluents to Freshwater and Marine Organisms, Fourth Edition, (EPA-600/4-90/027) or the most recent edition. Acute toxicity tests will be conducted on 24-hour composite samples of effluent, and tests must be initiated within 36-hours of completion of the sampling period.
 - a. If the Mississippi Office of Pollution Control determines the receiving stream is freshwater, the permittee must use both the following test organisms and test durations:
 - (1) Pimephales promelas (< 24-hrs.of age) 96 hour
 - (2) Ceriodaphnia dubia 48 hour
 - b. If the Mississippi Office of Pollution Control determines the receiving stream is marine or estuarine, the permittee must use both the following test organisms and test durations:
 - (1) Menidia beryllina 96 hour
 - (2) Mysidopsis bahia 48 hour
 - Dilution water used for these tests shall consist of reagent grade water, defined as distilled or deionized water that does not contain substances which are toxic to the test organisms. For freshwater tests, dilution water shall consist of reagent grade chemicals or mineral water combined to make moderately hard dilution water according to Methods for Measuring the Acute Toxicity of Effluents and Receiving Waters to Freshwater and Marine Organisms, Fourth Edition, (EPA-600/4-90/027) or most recent edition. For estuarine testing, dilution water shall consist of synthetic seawater or hypersaline brine combined to achieve a salinity of 20 parts per thousand according to Methods for Measuring the Acute Toxicity of Effluents and Receiving Waters to Freshwater and Marine Organisms, Fourth Edition, (EPA-600/4-90/027) or most recent edition. These dilution waters will be deemed acceptable if the survival of the control organisms in the toxicity tests is 90% or greater.
 - d. A standard reference toxicant quality assurance test (acute) shall be conducted concurrently with the effluent tests using both species used in the toxicity tests. Alternatively, if a lab conducts monthly QA/QC reference toxicant tests for both species as part of their SOP, these results may be submitted in lieu of the above mentioned concurrent tests. In either case the reference toxicant test results must be submitted in the final report as well as on the Mississippi Office of Pollution Control NPDES Whole Effluent Toxicity Testing Report Form.

PART II
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Permit No. MS0001830

- The permittee shall conduct the first series of tests specified in Section 2 above within 90 days of the issuance of the permit. tests shall be conducted quarterly thereafter for twelve (12) consecutive months, provided that the acute LC50 is greater than or equal to 3%. After the first year of testing, the frequency of monitoring will be reduced to once per six months for the life of the permit. Sampling shall be timed to cover the seasonal extremes of the year (hot-dry and cold-wet). The results of these acute toxicity tests shall be reported to the Mississippi Environmental Quality Permit Board on the next quarterly discharge monitoring report. Final acute toxicity test results shall be in report form as outlined in Methods for Measuring the Acute Toxicity of Effluents to Freshwater and Marine Organisms, Fourth Edition, (EPA-600/4-90/027) or most recent edition. Along with this report, the permittee must submit a completed Mississippi Office of Pollution Control NPDES Whole Effluent Toxicity Testing Report Form within two weeks following test completion.
- 4. If either toxicity test results in an LC₅₀ value of less than 3%, the permittee shall initiate a second toxicity test within 2 weeks after the completion of the first toxicity test using the organism(s) that failed. The LC₅₀ determinations from these tests shall be reported to the Mississippi Environmental Quality Permit Board within two weeks after completion the test.
- 5. In the event that the results of any toxicity test reveals that the LC_{50} of the permittee's effluent is less than 3%, then this finding will constitute a violation of Part I of this permit. In the event the permittee passes the second toxicity test, the permittee shall resume testing in accordance with the testing schedule set forth in the permit. In the event the permittee fails the second WET test, the permittee shall submit a Toxicity Reduction Evaluation Plan (TREP) within 45 days following completion of the follow-up tests to reduce the toxicity of the effluent to safe levels. The first phase of the TREP shall include monitoring to characterize the toxicity of the effluent.

In addition to the specific conditions of this permit, the permittee shall comply with all applicable conditions of 40 CFR 122.7 and 40 CFR 122.61 (06-03-93).

¹Safe levels will be determined by the Mississippi Pollution Control Permit Board.

*Contact the Mississippi Office of Pollution Control Laboratory for information on most recent edition(s) of methods manual.

PERMIT RATIONALE HERCULES INCORPORATED MS0001830 HATTIESBURG, MS FORREST COUNTY

DRAFT

I.GENERAL INFORMATION

1, Nature of business:

Manufacture of modified resins, resin solutions and paper chemicals.

DECEMBER 9,1996

2.Applicable guidelines:

2000-2002

existing limits

	Monthly ave	Daily Max	Basis	ave	max
BOD5	79.54(175.2)	53 (116.8)	WQ	(1634)	(3051)
TSS	191 (421)	531 (1170)	BPJ	(579)	(1648)
TOC	796 (1755)	1107(2436)	BPJ	(2500)	(3800)
Oil/greas	e 53.1(117)	79.5 (175)	BPJ	(660)	(990)
Phenol	.54 (1.19)	1.6 (3.5)	WQUAL.LI	M.(3.3)	(4.9)

5. Waste Water Treatment:

Sedimentation, floatation, neutralization, and carbon adsorption.

6. Application information: Form 2-c

	max daily lb/d	max 30 day	long term ave
BOD	1,747	871	445
TOC	1,352	742	448
COD	3,309	_	-
TSS	542	172	126
NH3N	47	_	-
FLOW	1.94 MGD	.96 MGD	.69 MGD

chem	conc mg/l	chem	conc mg/l
Br	7.1	Мо	.009
F	.15	Mg	.07
N(ORG)	8.9	Sn	.01
Oil&GRE	161	Ni	.01
Sulfate	480	Se	.009
Sulfide	3.0	Th	.018
Sulfite	3.8	Zinc	.04
surfact	.17	Phenols	.03
Al	.22	Toluene	.235
Boron	.22	BBPhthal ates	.036
Fe	.22	Phenol	.829

7. Standards for discharge 1997 to 1999

The existing basis for limits, i.e. the dilution of the Bowie River, will be allowed for a three year period. The Categorical\Best Professional Judgement based limits which are more stringent than limits based upon the dilution of the Bowie River will be enforced. After two years the limits based on the tributary (7Q10=0) will be in place. These limits are more stringent than Categorical\Best Professional Judgement derived limits and are derived directly from State of Mississippi Water Quality Standards and Regulations.

1.BOD5

Categorical limits: Gum and Wood Chemical Manufacturing and Rubber Manufacturing

1142201 11411414141	5	lb/10001	b prod	lb/day	
Product lbs/d	40cfr ref	•	max	avg	max
resins 345,177	454.31	1.1	2.08	379.7	718
rubber 40,800	428.103	.12	.08	3.3	4.9
misc paper 549,678	*	1.0	1.87	549.6	1028
chem				933	1751

*AVE BOD= 379.7/385,977 =1.0(LBS BOD/1000 LBS) MAX BOD= 722.9/385,977 =1.87(LBS BOD/1000 LBS)

cont'

These limits are more stringent than previous limits that were based on higher production rates.i.e. 1631 ave,3051 max.

The Water Quality Monitoring Branch recommended a BOD limit of 2425 LBS/DAY. The categorical limit is more stringent and will be used .

2.TSS Categorical limits

'lb/1000lb prod lb/day

		•	-	•	-
Product lbs/d	40cfr ref	30day ave	max	avg	max
resins 345,177	454.31	0.475	1.38	164	476.5
rubber 40,800	428.103	0.24	0.16	9.8	6.5
misc paper 549,678	*	0.45	1.25	<u>247.:</u> 421	3 <u>687</u> 1170

*AVE BOD= 173.8/383,977=.45(LBS BOD/1000 LBS) MAX BOD= 483./385,977=1.25(LBS BOD/1000 LBS)

These limits are more stringent than previous limits that were based on higher production rates.i.e. 579 ave,1648 max.

3. TOC

There are no established limits for TOC, therefore the existing limits will be used factoring in the reduced production as compared to production during the last permit period.i.e.: 935655/1292400(LBS OF PRODUCTS)=.72 ..72*3800=2436 LBS/D MAX .72*2500=1755 LBS/D AVE.These limits are being met by current technology, activated carbon filter.

4. Oil&grease

The current mass limit, 660 lbs/d ave , 990 lbs/d max are less than the 10 ppm limit to prevent an oil sheen.i.e. : 660/(116.3*8.34) = .68 ppm

5. Phenol

Phenol limits are established by applying the State water quality limits to the river and estimating the maximum allowable concentration in the effluent:

.96 mgd*C*8.34 = .3*(116.3+1.4)*8.34

C=37 PPM MAX.,=294.4 LBS/D

C=12.6 PPM AVE.,=117.4 LBS/D

Current permit limits are more stringent and will be maintained. 4.9 lbs/d max, 3.3 lbs/d ave. The current technology, activated carbon filter, is well suited for removing phenol. Since current limits have been maintained they will be continued as representing technology based limits.

LIMITS 2000-2002 1.BOD

Water Quality Monitoring limit for a 7Q10=0 stream is BOD5 ave = 10mg/l .

Mass limits BOD5

1.4*8.34*10mg/l=117 lbs/d ave 1.4*8.34*15mg/l=175lbs/d max

Current discharge from application

Max.daily Max 30 day ave 1747lbs/d 871lbs/d

Current control technology has not been reaching the proposed limits.

2.TSS

Proposed limits are based upon Best Professional Judgement.

AVE= 30PPM MAX= 45PPM 1.4MGD*8.34*30MG/L= 350 LBS/D 1.4MGD*8.34*45MG/L= 525 LBS/D

The existing system can meet the ave but not the max limit. FORM 2-C:

126 LBS/D AVE 542 LBS/D MAX

3.0il and Grease

Proposed limits : 10 mg/l ave , 15 mg/l max 1.4 *8.34*10 mg/l=116.7 lbs/d 1.4 *8.34*15 mg/l=175 lbs/d

The proposed limits are based upon the minimum amount of oil that will produce an oil sheen on the water surface.

4.Phenol

State Water Quality Limits are .3 mg/l max, .102 mg/l ave. These limits translate to : .3 mg/l * 1.4 MGD * 8.34 = 3.5 LBS/D .102 MG/L * 1.4 MGD * 8.34= 1.19 LBS/D These discharge limits are more stringent than previous limits. (4.9 lbs/d , 3.3 lbs/d ave) Form 2-c list Phenol at a concentration of .829 mg/l. This concentration is above the proposed limits.

5.TOC

There are no established limits for TOC, therefore the existing limits will be used factoring in the reduced production as

compared to production during the last permit period.ie: 935655/1292400(LBS OF PRODUCTS)=.72 ..72*3800=2436 LBS/D MAX .72*2500=1755 LBS/D AVE.These limits are being met by current technology, activated carbon filter.

PROPOSED LIMITS FOR DISCHARGE

2000	-2002			existing	limits
Мо	nthly ave	Daily Max	Basis	ave	max
TSS TOC Oil/grease	9.54(175.2) 191 (421) 796 (1755) 53.1(117) .54 (1.19)	53 (116.8) 531 (1170) 1107(2436) 79.5 (175) 1.6 (3.5)	WQ BPJ BPJ BPJ WQUAL.LIM.	(1634) (579) (2500) (660) (3.3)	(3051) (1648) (3800) (990) (4.9)

PROPOSED L	IMITS, 1997-	2000			
	nthly ave	Daily Max			
BOD5	424 (933)	795 (1751)	CAT	(1634)	(3051)
TSS	191 (421)	531 (1170)	CAT	(579)	(1648)
TOC	796 (1755)	1107(2436)	BPJ	(2500)	(3800)
Oil/grease	300 (660)	450 (990)	BPJ	(660)	(990)
Phenol	1.5(3.3)	2.2 (4.9) WC	UAL.LIM.	(3.3)	(4.9)

BATEA Statement:

We believe the proposed limits represent Best Available Control Technology that is Economically Achievable. This is based upon our Best Professional Judgement.

TOXICITY SCREENING

Qw=.96 MGD(TOTAL 1.4 INCLUDES NON-CONTACT COOLING WATER) Qr=116.3MGD IWC= .96 MGD/(1.4+116.3)*100% = .8% Xr=0 assumed for all parameters

total Al

Xw=.220*10=2.2 (less than 12 samples)

Xt= 2.2*.96/(1.4+116.3)= .02 mg/l

AWQC= .750mg/l

CWQC=.087 mg/l

total Boron

Xw= .22*10=2.2 (less than 12 samples)

Xt = 2.2 * .96 / (1.4 + 116.3) = .020

AWQC=no data CWQC=.750 mg/ l

total Ni

Xw=.01*10=.1 (less than 12 samples)

Xt = .1 * .96/(1.4+116.3) = .0008

AWQC=.787 mg/l CWQC=.087 mg/l

total Selenium

Xw = .009 * 10 = .09 (less than 12 samples)

Xt = .09 * .96/(1.4+116.3) = .0008

AWQC=.02 mg/l CWQC=.005 mg/l

total Zinc

Xw=.04 *10=.4 (less than 12 samples)

Xt = .4 * .96 / (1.4 + 116.3) = .0042

AWQC= .0636 mg/l CWQC= .0581 mg/l

Phenol

Xw = .829 mg/l

Xt = .829 * .96 / (1.4 + 116.3) = .0083 mg/l

AWQC=.3 mg/l CWQC=.1 mg/l

ACUTE TOXICITY SCREENING SUMMARY (EXISTING LIMIT BASIS)

Parameter	AWOC mg/l	Xt mg/l	PASS/FAIL
Total Al	.750	.026	PASS
			PASS
Total Boron	no data	.02	
Total Nickel	.787	.0012	PASS
Total Selenium	.02	.001	PASS
Total Zinc	.0636	.005	PASS
Phenol	.3	.099	PASS

CHRONIC TOXICITY SCREENING SUMMARY

Parameter	CWOC	Xt	PASS/FAIL
	mg/1	mg/l	
Total Al	.087	.026	PASS
Total Boron	.750	.02	PASS
Total Nickel	.087	.0012	PASS
Total Selenium	.005	.001	PASS
Total Zinc	.0581	.005	PASS
Phenol	.102	.099	PASS

TOXICITY SCREENING MATRIX

				perm	nt requi	irements
IWC	CSSa	CSSp	WETp	CSl	WETl	WETm
2.4%	P	P	P	Y	Y	N/A

TOXICITY SCREEN FOR TRIBUTARY 1999

ACUTE TOXICITY SCREENING SUMMARY

(Xt = Xw * .96/1.4)

Parameter	AWOC mg/l	Xt mg/l	PASS/FAIL
Total Al Total Boron	.750 no data	1.5	FAIL
Total Nickel	.787	.68	FAIL
Total Selenium	.02	.062	FAIL
Total Zinc	.0636	.272	${ t FAIL}$
Phenol	.3	.564	FAIL

CHRONIC TOXICITY SCREENING SUMMARY (Xt=Xw*.96/1.4)

Parameter	CWOC	Xt	PASS/FAIL
	mg/1	mg/l	
Total Al	.087	1.5	FAIL
Total Boron	.750	1.5	FAIL
Total Nickel	.087	.068	PASS
Total Selenium	.005	.062	FAIL
Total Zinc	.0581	.272	FAIL
Phenol	.102	.564	FAIL

TOXICITY SCREENING MATRIX

permit requirements

IWC CSSa CSSp WETp CS1 WET1 WETm 100% f f N/A Y Y N/A

FACT SHEET

APPLICATION FOR NATIONAL POLLUTANT DISCHARGE ELIMINATION SYSTEM PERMIT TO DISCHARGE WASTEWATER TO WATERS OF THE STATE OF MISSISSIPPI

Application No.: MS0001830 (Reissuance) Date: January 9,1997

1. SYNOPSIS OF APPLICATION

a. Name and Address of Applicant

Hercules Incorporated
613 West 7th Street
P.O. Box 1937
Hattiesburg, MS 39401
Contact: Mr. Charles Jordan
(601) 545-3450

b. Description of Applicant's Operation

Manufacture of modified resins, resin solutions and paper chemicals.

2. Applicable guidelines:

40CFR Part454 Gum and Wood Chemical Manufacturing Point Source Category, subpart c woodrosin, turpentine and pine oil.

40CFR Part428 Rubber Manufacturing Point Source Category,

c. Production Capacity of Facility
N/A

- d. Description of Existing Pollution Abatement Facilities Sedimentation, floatation, neutralization, and carbon adsorption.
- e. Applicant's Receiving Waters

Bowie River

f. Description of Discharges

Outfall 001 - 0.96 MGD(internal outfall into 002)
Outfall 002 - 1.4 MGD

Bowie River 7Q10 =116.3 mgd

2. PROPOSED EFFLUENT LIMITATIONS 2000-2002

existing

limits

Monthly ave			I	Daily Max	x Basis	ave
max BOD5 (3051)	79.54	(175.2)	53	(116.8)	WQ	(1634)
TSS (1648)	191	(421)	531	(1170)	BPJ	(579)
TOC (3800)	796	(1755)	1107	(2436)	BPJ	(2500)
Oil/grease (990)	53.	1(117)	79.	5 (175)	BPJ	(660)
Phenol (4.9)	.54	(1.19)	1.6	(3.5)	WQUAL.	LIM.(3.3)

3. MONITORING REQUIREMENTS

The applicant will be required to monitor regularly for flow and those parameters limited in Section 2 above with sufficient frequency to ensure compliance with the permit conditions. Frequency, methods of sampling, and reporting dates will be specified in the final permit.

4. PROPOSED COMPLIANCE SCHEDULE FOR ATTAINING EFFLUENT LIMITATIONS

The facility will have three years to achieve proposed permit requirements.

5. PROPOSED CONDITIONS OF APPLICABILITY AND OTHER REQUIREMENTS

2000-2002 existing limits

1	Monthl	y ave	1	Daily Max	Basis	s ave	max
BOD5	79.54	(175.2)	53	(116.8)	WQ	(1634)	(3051)
TSS	191	(421)	531	(1170)	BPJ	(579)	(1648)
TOC	796	(1755)	110'	7(2436)	BPJ	(2500)	(3800)
Oil/grease	e 53.	1(117)	79	.5 (175)	BPJ	(660)	(990)
Phenol	.54	(1.19)	1.6	5 (3.5)	WQUAL	.LIM.(3.3)	(4.9)

6. WATER QUALITY STANDARDS AND EFFLUENT STANDARDS APPLIED TO THE DISCHARGE

See attached permit rationale.

7. PROCEDURES FOR THE FORMULATION OF FINAL DETERMINATIONS

a. Comment Period

The Mississippi Office of Environmental Quality Permit Board proposes to issue an NPDES permit to this applicant subject to the effluent limitations and special conditions outlined above. These determinations are tentative.

Interested persons are invited to submit written comments on the permit application or on the Permit Board's proposed determinations to the following address:

Mississippi Department of Environmental Quality Office of Pollution Control P. O. Box 10385
Jackson, Mississippi 39209

Additional details about the application and the proposed determination, a sketch showing the location of the discharge, and a copy of the draft permit are available by writing Jerry Cain at the Permit Board's address or calling Charles Cook at 961-5171.

All comments received prior to December 31, 1996, will be considered in the formulation of final determinations with regard to this application.

b. Public Hearing
The Permit Board may hold a public hearing if there is a significant degree of public interest in a proposed permit or group of permits. Public notice of such a hearing will be circulated in newspapers in the geographical area of the discharge and to those on the agency's mailing list at least 30 days prior to the hearing.

Following the public hearing, the Permit Board may take such modifications in the terms and conditions of the proposed permits as may be appropriate and shall issue or deny the permit. Notice of issuance or denial will be circulated to those who participated in the hearing and to appropriate persons on the mailing list.

c. Issuance of the Permit When No Public Hearing is Held

If no public hearing is held, and, after review of the comments received, the Permit Board's determinations are substantially unchanged, the permit will be issued and become effective immediately.

If no public hearing is held, but there have been substantial changes, public notice of the Permit Board's

revised determinations will be made. Following a 30-day comment period, the permit will be issued and become effective immediately, unless a public hearing is granted.



PUBLIC NOTICE

Mississippi Environmental Quality Permit Board
P. O. Box 10385
Jackson, MS 39209
Telephone No. (601) 961-5171

Febuary 1, 1997

Hercules Incorporated, located at 613 West 7th Street P.O.10385 Hattiesburg, Ms. 39209, has applied to the Mississippi Environmental Quality Permit Board for the reissuance of an NPDES Permit to discharge treated chemical process waste water and non-contact coolingwater from a waste water treatment system to a tributary of the Bowie River. The applicant's operation manufacters resins and paper chemicals. One discharge is described in the application.

The environmental impact of this project has been evaluated and the staff of the Permit Board believes that, with proper environmental constraints and limitations on the applicant, this project will operate within all State and Federal environmental laws and standards. Therefore, the staff of the Board has preliminarily decided, based on available information, to recommend to the Board that a permit be issued containing numerous environmental regulatory constraints specifically stated in the draft permit. However, before proceeding further with the staff evaluation, public comments are being solicited. The staff recommendation to the Board, as well as the Board decision, will be made only after a thorough consideration of all public comments.

Persons wishing to comment upon or object to the proposed determinations are invited to submit comments in writing to Jerry Cain at the Permit Board's address shown above, no later than Febuary 31,1996. All comments received by that date will be considered in the formulation of final determinations regarding the application. A public hearing will be held if the Permit Board finds a significant degree of public interest in the proposed permit.

Additional details about the application and the proposed determination, a sketch showing the location of the discharge, and a copy of the draft permit are available by writing or calling Charles Cook at the Permit Board's address and telephone number shown above. Also, this and other information is available for review and copying during normal business hours at the Southport Center Building located at 2380 Highway 80 West, Jackson, MS.

Please bring the foregoing to the attention of persons whom you know will be interested.